



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING DISTRICT OFFICE

**EGLE**  
LIESL EICHLER CLARK  
DIRECTOR

October 16, 2019

Mr. Keith Granger, Chief Executive Officer  
Granger Waste Services  
16980 Wood Road  
Lansing, Michigan 48906

SRN: N5997, Clinton County

Dear Mr. Granger:

**VIOLATION NOTICE**

A recent file review of Michigan Air Emissions Reporting System (MAERS) reporting data was conducted in response to Granger Wood Street Landfill and Energy Developments, LLC's (EDL) application to install additional flares and a Renewable Natural Gas plant. In particular, the emissions reported on March 13, 2017, for the 2016 emissions reporting year for Granger Wood Street Landfill and gas-to-energy plant, located at 16980 Wood Road, Lansing, Michigan, were reviewed. The 2016 emissions indicate the following issues with respect to the emission units operating at the landfill:

Process Description	Rule/Permit Condition Violated	Comments
EUFLARE  A 1,300 scfm open flare for backup control of the landfill gas	Rule 201 (R 336.1201)	The information provided with the MAERS report demonstrates that actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the flare have increased.

The flare was originally evaluated using U.S. Environmental Protection Agency's *Compilation of Air Pollutant Emissions Factors (AP-42)* emission factors. The reported emissions to MAERS were based on gas samples that were collected May 31, 2016, which is approximately 22 times the AP-42 concentrations. Please be advised that potential emissions of SO<sub>2</sub> could be greater than 40 tons per year, which exceeds the significant threshold and may trigger New Source Review (NSR) for a major modification.

At a minimum, this is a violation of Rule 201 of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

A program for compliance shall include a completed PTI application for EUFLARE.

Since the increase in total sulfur in the landfill gas is considered a change in the method of operation, and affects the exempt equipment at the facility, the four (4) 3516 engines,

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the three (3) 3520 engines, and the 1,300 scfm flare are part of the project and require permitting, per Rule 201. Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or modification of any process or process equipment which may be a source of an air contaminant.

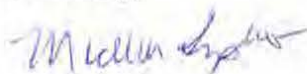
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 6, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Lansing District Office, at Constitution Hall, 525 W. Allegan, First Floor South, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If you believe the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michelle Luplow  
Environmental Quality Analyst  
Air Quality Division  
517-284-6636

cc: Ms. Kim Smelker, Granger Waste Services  
Mr. Tim Krause, Granger Waste Services  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Brad Myott, EGLE