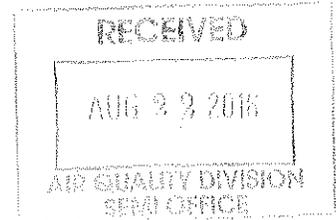




RL

August 19, 2016

Ms. Rebecca Loftus
Michigan Department of Environmental Quality
Air Quality Division
SE MI District
27700 Donald Court
Warren, Michigan 48092



RE: Notice of Violation dated August 3, 2016
Oakland Heights Development, Inc. - MI-ROP-N6008-2015
Auburn Hills, MI

Dear Ms. Loftus;

On January 14, 2015 Oakland Heights Development, Inc. (OHD) submitted a Permit to Install (PTI) application for a 3,000 cubic feet per minute (cfm) utility flare. This flare had previously been installed at another facility within the organization. In the information provided to the site for permitting purposes, the flare was identified as having a restrictor plate. This plate is not easily removed and requires the use of a man-lift and the flare to be shutdown. Therefore, the operational limit of the flare was 3,000 cfm. This is what the Potential to Emit (PTE) from the flare for the application was based upon.

The facility received the PTI and commenced installation and set-up of the flare. The facility is equipped with two (2) flow meters because landfill gas is sold to a third party. One flow meter records the total amount of gas being collected from the landfill regardless of where the gas is destructed and the other flow meter records the landfill gas flow sent to the flare. The flow meter that records the total amount of gas collected is installed for operational purposes only because of the third party beneficial use project and is not a requirement of a State of Michigan PTI. This is also the flow meter that was displaying 3,500 cfm at the time of the MDEQ inspection on February 17, 2016.

OHD calibrates both flow meters in accordance with the manufacturer's recommendation of once every 18 months. The facility has since recalibrated the flow meter that measures total landfill gas in accordance with the manufacturer recommendation. The records of the calibration for both flow meters are attached to this correspondence.

During the February 17, 2016 MDEQ inspection, the flow meter recording information to the flare was properly calibrated. Furthermore, the flow recorded by this flow meter has demonstrated compliance with the 3,000 cfm flow limitation with the exception of one event that lasted approximately 1 hour and minor 1 to 2 minute excursions. A CD providing the recorded flow since the completion of installation of the flare has been attached.

Finally, the pipeline servicing GM is considered the primary control. Neither the permit nor the regulations require the flare provide 100% back-up control of the primary control device. However, because landfill gas exceeded the predictive generation models, OHD

elected to re-submit an application to allow for a higher flow rate through the flare. This application was submitted on July 7, 2016. Once the PTI is approved, the facility will increase the flow rate to the utility flare as needed.

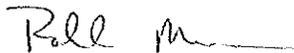
It is important to note the landfill has not exceeded the current potential to emit permit limits of 26.8 tons per year (TPY) of Nitrogen Oxides (NO_x), 145.85 TPY of Carbon Monoxide (CO), 52.76 TPY of Sulfur Dioxide (SO₂), 2.56 TPY of Volatile Organic Compounds (VOC), and 6.70 TPY of Particulate Matter (PM₁₀ and PM_{2.5}). Once the new PTI is approved, the PTE will be 45.55 TPY for NO_x, 207.74 TPY for CO, 89.70 TPY for SO₂, 3.59 TPY of VOC and 11.39 TPY of PM₁₀ and PM_{2.5}.

As stated in the August 3, 2016 NOV, one resolution to this issue would be the submittal of an updated PTI. As the facility submitted this application prior to issuance of the NOV, the facility believes that no further action is required.

Should you have additional questions regarding this matter, please contact me at 586-495-6762, or Ms. Dana Oleniacz of AQSI at 248-421-0499.

Sincerely,

OAKLAND HEIGHTS DEVELOPMENT, INC.

A handwritten signature in cursive script that reads "Robb Moore".

Robb Moore
Environmental Manager