



April 9, 2018  
ECT No.: 17-0189-0900

Mr. Chance Collins  
Environmental Quality Analyst  
MDEQ-AQD Cadillac District Office  
120 West Chapin Street  
Cadillac, Michigan 49601-2158

Re: **Response to March 19, 2018 Violation Notice**  
PTI 129-97A/SRN N6080 – Bagley 23 CPF  
Ward Lake Energy

Dear Mr. Collins:

Environmental Consulting & Technology, Inc. (ECT), on behalf of Ward Lake Energy (WLE), compiled the following response to the Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Violation Notice dated March 19, 2018 for the Bagley 23 CPF, Permit to Install (PTI) 129-97A, SRN N6080.

The following violation was cited:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1 – CO emission limit of 1 tpy, based on a 12 month rolling time period	PTI 129-97A, SC I.2	Actual emissions exceeded limit (as high as 2.419 tpy, based on a 12 month rolling time period)

As noted in ECT's January 17, 2018 response to the MDEQ-AQD Request for Records, a discrepancy was discovered for the Carbon Monoxide (CO) Permit Limit for EUENGINE1. The PTI Application (attached) calculated Potential to Emit (PTE) for CO at 5.0 tons per year (tpy). However, an erroneous calculation in the Permit Evaluation Form (attached) presented the CO limit at 0.75 tpy.

It is the opinion of ECT that although in context a violation has occurred, in terms of the PTE presented in the PTI Application, calculations have never exceeded the PTE for CO, thus implying a violation has not occurred.

The logical "next step" to alleviate the discrepancy in the PTI is to re-issue the PTI with the correct emission limit for CO. On behalf of WLE, ECT sincerely appreciates MDEQ-AQDs willingness to accommodate this proposed resolution to the above violation.

3399 Veterans Drive  
Traverse City, MI 49684

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FAX  
(231) 946-8208

**Closing**

ECT sincerely appreciates the opportunity to provide our consulting services on this important project. Should you have questions or require additional information, please do not hesitate to contact the undersigned at 231.946.8200, [lharriger@ectinc.com](mailto:lharriger@ectinc.com), or [jlewandowski@ectinc.com](mailto:jlewandowski@ectinc.com).

Sincerely,

**ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.**



Lisa M. Harriger-Jones  
Senior Scientist



Jeremy S. Lewandowski  
Senior Engineer

cc: Mr. Jeff Riling – Ward Lake Energy

Attachments: PTI Application Supplemental Information  
Permit Evaluation Form

## Collins, Chance (DEQ)

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**From:** Jeremy Lewandowski <jlewandowski@ectinc.com>  
**Sent:** Monday, April 09, 2018 3:35 PM  
**To:** Collins, Chance (DEQ)  
**Cc:** Jeff Riling; Lisa Harriger  
**Subject:** Response to March 19, 2018 Violation Notice - Bagley 23 CPF SRN N6080  
**Attachments:** Bagley 23 CPF PTI 129-97A.Response to Violation Notice.4-09-2018.pdf

Hi Chance –

Attached please find the response to the March 19, 2018 Violation Notice for the Bagley 23 CPF, SRN N6080.

Thank you –

Jeremy S. Lewandowski  
Senior Engineer



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