



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
CADILLAC DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

March 19, 2018

Mr. Jeff Riling  
Ward Lake Energy  
685 East M-32  
Gaylord, Michigan 49735

SRN: N7190, Montmorency County

Dear Mr. Riling:

**VIOLATION NOTICE**

On February 1, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the Vienna 6/7 CPF located at Vienna Township, Montmorency County, Michigan. The purpose of this inspection was to determine Ward Lake Energy's, Vienna 6/7 CPF compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 226-02A;

During the review of records, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1 – CO emission limit of 2 tpy, based on a 12 month rolling time period	PTI 226-02A, SC I.2	Actual emissions exceeded limit (as high as 5.860 tpy, based on a 12 month rolling time period)
EUENGINE1 – Reporting of replacement engine	PTI 226-02A, SC VII.1	Engine change out with similar engine is allowed, but must be reported within 30 days.

During the review of records, it was noted that EUENGINE1 at the facility had been changed out with a similar engine. This is allowed under Permit to Install Number 226-02A. However, Special Condition VII.1 of PTI Number 226-02A states:

*Except as provided in R 336.1285, if the engine is replaced with an equivalent-emitting or lower-emitting engine, the permittee shall notify the AQD District Supervisor of such change-out and submit acceptable emissions data to show that the alternate engine is equivalent-emitting or lower-emitting. The data shall be submitted within 30-days of the engine change out.*

Ward Lake Energy did not provide the required notification that EUENGINE1 was changed out. This is a violation of the reporting requirements specified in Special Condition number VII.1 of PTI number 226-02A.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 9, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Ward Lake Energy believes 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 violations 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,



Chance Collins  
Environmental Quality Analyst  
Air Quality Division  
231-878-2304 / CollinsC21@michigan.gov

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Shane Nixon, DEQ