



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



DAN WYANT
DIRECTOR

June 23, 2014

Mr. Jeff Riling
Ward Lake Energy - Bear Lake 28 CPF
P.O. Box 1663
Gaylord, Michigan 49734-5663

SRN: N8032, Manistee County

Dear Mr. Riling:

VIOLATION NOTICE

On May 23, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a review of fuel consumption use, NOx and CO records of Bear Lake 28 CPF located in the NE 1/4, NE 1/4, SE 1/4, of Section 28 in Bear Lake Township, Manistee County, Michigan. The purpose of the records review was to determine Bear Lake 28 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 administrative rules and the emission limit conditions of Permit to Install (PTI) number 113-08A.

During the records review, DEQ staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
NOx and CO emission reported for EUENGINE1	Special Conditions (SC) 1.1 and 1.2	NOx emission limits were reported 22.5 tons per year and CO emissions were reported at 20.8 tons per year, based on 12-month rolling time periods.
NOx emission limits reported for EUENGINE3	SC1.5	NOx emission were reported 31.7 tons per year, based on a 12-month rolling time period.

The records provided demonstrate that actual emissions of NOx and CO from EUENGINE1 are 22.5 tons per year for NOx and 20.8 tons per year for CO, based on a 12-month rolling time period, which exceeds the permitted emission limits of 21.5 tons per year for NOx and 20 tons per year of CO, based on 12-month rolling time periods. Also, the records provided demonstrate that actual emissions of NOx from EUENGINE3 are 31.7 tons per year based on a 12-month rolling time period, which exceeds the permitted emission limits of 28.4 tons per year for NOx, based on a 12-month rolling time period.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 14, 2014 (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 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,



Caryn Owens
Environmental Quality Analyst
Air Quality Division
231-876-4414

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Janis Ransom, DEQ