



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

August 3, 2023

Andrew Meyer
City of Grand Rapids
Environmental Services Department
1300 Market Avenue SW
Grand Rapids, Michigan 49503

SRN: B1729, Kent County

Dear Andrew Meyer:

VIOLATION NOTICE

On July 18, 2023 and July 19, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed compliance testing conducted at the Grand Rapids Water Resource Recovery Facility located at 1300 Market Avenue SW, Grand Rapids, Michigan. The purpose of this compliance testing was to determine the City of Grand Rapids' compliance with the conditions of Permit to Install (PTI) number 37-19B and 40 CFR Part 60 Subpart JJJJ.

During testing, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCHP3 1.411 MW natural gas/renewable natural gas-fired combined heat and power engine	PTI No. 37-19B, FGCHP, Special Condition I.7.	Exceedance of the pound per hour formaldehyde emission limit.

During compliance testing it was noted that after the first run of testing, the formaldehyde emissions were exceeding the permitted pound per hour rate. The emission rate calculated by the stack testers was 0.078 pounds per hour, which is greater than the permitted emission rate of 0.056 pounds per hour. Testing was aborted following the completion of run No. 1 on EUCHP3, when it was determined that formaldehyde emissions exceeded the permitted limit.

The cited Special Condition I.7. of PTI number 37-19B is also enforceable as paragraph 9.A. of Consent Order, AQD number 2020-16.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 24, 2023 (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, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the City of Grand Rapids 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 violation cited above and for the cooperation that was extended to me during compliance testing. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-558-0616

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE