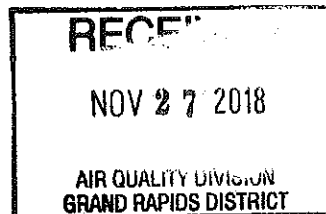


CITY OF GRAND RAPIDS
ENVIRONMENTAL SERVICES DEPARTMENT

November 27, 2018

Ms. Kaitlyn DeVries
Michigan Department of Environmental Quality
Air Quality Division
Grand Rapids District
350 Ottawa Avenue NW
Grand Rapids, MI 49503



Re: SRN: B1729 Kent County

Dear Ms. DeVries,

The City does not believe that a violation of Rule 201 has occurred because the activities that have taken place to date are not a part of the activities that require a permit to install. Site preparation activities to stabilize soils began on March 22, 2018. No foundations for the digesters, engines or flares have been installed yet. No equipment has been purchased at this time. Work continues on the structures and tanks that will be required for the solids handling portion of the project.

The City of Grand Rapids submitted the PTI application for installation of 3 anaerobic biodigesters with up to 3 natural-gas combined heat & power units (reciprocating internal combustion engines), 2 flares and ancillary fuel-burning equipment on November 7th, 2018. The equipment required to clean the gas so it can be used in the combined heat and power units is part of a separate project which has not begun. An application for the permit to install this glass cleaning equipment will be forthcoming.

It is my understanding that the permitting process may require public comment and possibly a public hearing, which will delay the issuance of the permit into next calendar year. The City's Construction Manager has received bids for equipment and construction of the remaining processes required for the project, and is currently considering purchases and scheduling construction activities for the installation. Since the City would like to keep this project moving forward with minimal additional costs and delays, the City is requesting to meet with MDEQ Air Quality permitting and regulatory staff to further discuss concerns over the future installation of the equipment requiring a permit and completion of the permitting process.

Very truly yours,

William Kaiser
Plant Superintendent

cc: Mike Lunn, City of Grand Rapids
Ms. Jenine Camilleri, DEQ
Mr. Eric Grinstein, DEQ

**Water Resource
Recovery Facility
Administrative Offices**
1300 Market Avenue SW
Grand Rapids, MI 49503
Tel: (616) 456-3000
Fax: (616) 456-3711

Engineering
1900 Oak Industrial Dr. NE
Grand Rapids, MI 49505
Tel: (616) 456-3000
Fax: (616) 456-3138

Sewer Maintenance
660 Market Avenue SW
Grand Rapids, MI 49503
Tel: (616) 456-3000
Fax: (616) 456-3736

Stormwater Management
1120 Monroe NW
Grand Rapids, MI 49503
Tel: (616) 456-3000
Fax: (616) 456-4088