

FORTISTAR Methane Group

Arbor Hills Energy LLC
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January 7, 2015

Mr. Glen Erickson
Air Quality Division
Michigan Department of Environmental Quality
301 East Lewis B. Glick Highway
Jackson, MI 49201

Subject: Response to Violation Notice issued December 15, 2014
Arbor Hills Energy LLC
ROP No.: N2688-2011

Dear Mr. Erickson;

As stated in the Violation Notice, the source test of EUTURBINE1-S3 (EGT-1), EUTURBINE2-S3 (EGT-2) and EUTURBINE4-S3 (EGT-4) was conducted on September 3 and 4, 2014. The Violation Notice concerns the late report for the results of the source test conducted on EGT-1 as well as the exceedance of the CO emission limit for EGT-1. The report was due by November 4, 2014, 60 days following the date of the source test, however Arbor Hills Energy LLC did not submit this data by that date. As explained in our November 14, 2014 letter to MDEQ, it was assumed that a passing source test on each EGT was required to be submitted to the MDEQ every Title V permit period and we have until April 2015 to record a source test on EGT-1, EGT-2 and EGT-3. Following a phone conversation with you in which you requested EGT-1 source test information, Arbor Hills Energy LLC submitted the preliminary results. This was nine days after the November 4, 2014 report due date for EGT-1. This report showed emissions for CO in excess of the current permitted limits in lb/hr.

In the November 14, 2014 submittal, Arbor Hills Energy LLC explained that the CO emission exceedance during the source test appeared anomalous and we provided the emission readings taken by on-site personnel from a calibrated emission monitor which resulted in compliant results. However, due to the preliminary results for EGT-1 and the District's need for a compliant source test, Arbor Hills Energy LLC had scheduled another test of EGT-1 and EGT-3 (EGT-3 added in order to complete testing requirements of every 5 years), to take place at the source testing firm's earliest availability to tentatively take place on December 18th-19th, 2014. Upon review of the protocol submitted by the selected source test firm, M3V, LLC., MDEQ staff indicated more comprehensive testing was required. M3V, LLC would not be able to conduct all required testing in the time allocated and they requested to move the test for EGT-1 and EGT-3 to January 13-15, 2015. MDEQ accepted the request and in the December 18, 2014 acceptance letter, Thomas Maza indicated the need

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for control samples to be obtained prior to testing. On January 5, 2015, Arbor Hills Energy LLC was notified by M3V LLC that the scheduled source test on January 13-15, 2015 will not be able to be kept due to many issues involving the logistics associated with the cold weather currently in Michigan and the need to receive the control samples in time. M3V LLC suggested that we delay the source test until March 10-12, 2015 in order to avoid these complications. Arbor Hills Energy LLC formally requests that the source test of EGT-1 and EGT-3 as specified in the test protocol previously accepted by the DEQ be conducted during March 10-12, 2015 by M3V, LLC.

As requested by Tom Maza, attached is the source test report which includes the final results of the source test conducted on EGT-1. This report was produced by TRC Solutions at the request of Arbor Hills Energy LLC.

If you have any questions, please contact Suparna Chakladar at your convenience at (951)-833-4153.

Sincerely,



Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
Arbor Hills Energy LLC

Enclosures

cc: Tom Maza, AQD Technical Programs Unit
Scott Miller, MDEQ
Suparna Chakladar, FMG