



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 15, 2014

CERTIFIED MAIL – 7007 3020 0002 7737 4474
RETURN RECEIPT REQUESTED

Mr. Anthony J. Falbo
Senior Vice President - Operations
FORTISTAR Methane Group
Arbor Hills Energy LLC
10611 West 5 Mile Road
Northville, Michigan 48167

SRN: N2688, Washtenaw County

Dear Mr. Falbo:

VIOLATION NOTICE

On December 3, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a telephone conference call between Suparna Chakladar, Vice President, FORTISTAR Methane Group, Scott Miller, AQD Supervisor, Jackson District Office, and me regarding your company's compliance source testing of three (3) stationary gas-fired turbines: EUTURBINE1-S3; EUTURBINE2-S3; and EUTURBINE4-S3, conducted on September 5, 2014, and September 6, 2014, at FORTISTAR Methane Group, Arbor Hills Energy, LLC (at the Arbor Hills Landfill) located at 10611 West 5 Mile Road, Northville, Michigan, 48167 (mailing address). The Arbor Hills Landfill and the FORTISTAR turbine plant are located within Washtenaw County.

The purpose of this telephone conference was to discuss AQD's evaluation of the stack testing report received by AQD on October 16, 2014, from your stack testing consultant TRC Environmental Corporation for the abovementioned stack testing events of September 5, 2014, and September 6, 2014, and to determine your status of 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 conditions of Renewable Operating Permit (ROP) number MI-ROP N2688-2011, Section 3.

During the phone call Mr. Miller and I discussed our evaluation of the test report of your September, 2014 compliance stack testing, for which we made the following observations:

Process Description	Rule/Permit Condition Violated	Comments
EUTURBINE1-S3, and EUDUCTBURNER1-S3	FGTURBINES-S3, and FGDUCTBURNERS-S3 <u>V. TESTING/SAMPLING</u> NOx; 4. CO; 4. SO2; 4. HCL; 4. VOC; 4.	The complete test report of the test results from the stack testing conducted on EUTURBINE1-S3; and EUDUCTBURNER1-S3 September 5, 2014, was not submitted to AQD within 60 days following the last date of the test, as required by ROP MI-ROP-N2688-2011; Section 3.
EUTURBINE1-S3, and EUDUCTBURNER1-S3	FGTURBINES-S3, and FGDUCTBURNERS-S3 <u>1. EMISSION LIMITS</u> CO: 13.1 lbs./hr. (EUTURBINE1-S3) CO: 2.2 lbs./hr.	The preliminary test results submitted to AQD on November 14, 2014, (69 days following the test date) reported the CO emissions from the combined exhaust from EUTURBINE1-S3, and EUDUCTBURNER1-S3 as 15.89 lbs./hr. averaged across all 3 test runs. This combined emission rate exceeds the combined emission limits in the ROP of 15.3 lbs./hr.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 7, 2015. 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 FORTISTAR 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 and for the cooperation that was extended to me during our telephone conference call. 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,



Glen E. Erickson
Senior Environmental Quality Analyst
Air Quality Division
517-780-7851

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
cc: Mr. Scott Miller, DEQ

