



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

November 19, 2018

Mr. Richard Spranger, Director of Operations
North American Natural Resources
300 North 5th Street, Suite 100
Ann Arbor, Michigan 48104

SRN: N2804, Montcalm County

Dear Mr. Spranger:

VIOLATION NOTICE

On November 6, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received emissions test data for the North American Natural Resources (NANR)– Central Generating Facility located at 21545 Cannonsville Road in Pierson, Michigan. The report and test data were used to determine NANR’s 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; the Air Pollution Control Rules; and Permit to Install (PTI) No. 45-17.

Based on the review of the company’s test data, staff verified the following:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1	PTI No.45-17, FGRICEENG, Special Condition 1.5	Testing conducted in September 2018 showed sulfur dioxide emissions of 3.6 lbs/hour which is above the 2.6 lbs/hour limit in the permit.
EUENGINE2	PTI No.45-17, FGRICEENG, Special Condition 1.6	Testing conducted in September 2018 showed sulfur dioxide emissions of 1.90 lbs/hour which is above the 1.5 lbs/hour limit in the permit.

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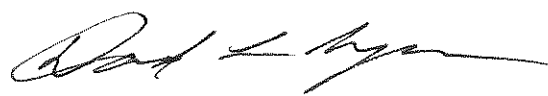
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 10, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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.

Please submit the written response to the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If NANR 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. 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,



David L. Morgan
Environmental Quality Specialist
Air Quality Division
616-356-0009

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ