

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

June 22, 2018

Mr. John Hyland, Supervisor City of Portland Board of Light and Power 259 Kent Street Portland, Michigan 48875

SRN: N5352, Ionia County

Dear Mr. Hyland:

## **VIOLATION NOTICE**

On June 12, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), was on-site to observe testing at the City of Portland Board of Light and Power located at 723 East Grand River Avenue, Portland, Michigan. The purpose of this observation was to determine the City of Portland Board of Light and Power'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 (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 353-94A.

During the on-site visit, staff observed the following:

| Process Description | Rule/Permit<br>Condition Violated            | Comments                        |
|---------------------|--|---------------------------------|
| Engine 3            | PTI No. 353-94A,<br>General Condition 11(a); | Opacity exceeding 20<br>percent |
|                     | Rule 301(1)(a)                               |                                 |

During stack testing conducted on June 12, 2018, it was noted that Engine 3 was emitting opacity in excess of the 20 percent limit, based on a 6-minute average, allowed by General Condition 11(a) of PTI No. 353-94A and Rule 301 of Act 451. Based on field observations, the City of Portland Board of Light and Power had an observed opacity of 100 percent for 1.5 minutes and greater than 20 percent for the remaining 6-minute averaging period.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 13, 2018 (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

Mr. John Hyland City of Portland Board of Light and Power Page 2 June 22, 2018

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 Kaitlyn DeVries, DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue, NW,Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the City of Portland Board of Light and Power 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 my on-site visit of the City of Portland Board of Light and Power. 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,

Chris Robinson Environmental Quality Analyst Air Quality Division 616-356-0259

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ Mr. Craig Fitzner, DEQ Mr. Christopher Ethridge, DEQ Ms. Jenine Camilleri, DEQ Ms. Heidi Hollenbach, DEQ Ms. Kaitlyn DeVries, DEQ