



VIA OVERNIGHT MAIL

August 10, 2020

Mr. Robert Joseph
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Air Quality Division (AQD)
27700 Donald Court
Warren, MI 48092-2793

RE: Pine Tree Acres, Inc. (SRN N5984)
Response to July 22, 2020 Violation Notice

Dear Mr. Joseph:

This correspondence is being submitted on behalf of Pine Tree Acres, Inc. (PTA) in response to the Violation Notice dated July 22, 2020. This response is timely submitted prior to the August 12, 2020 response date requested by EGLE. The Violation Notice cites Special Condition 1.4 of FGFLARES (EU-Flare 6) in Renewable Operating Permit No. MI-ROP-N5984-2019. Permit condition I.4 limits Carbon Monoxide emissions from Enclosed Flare #6 to 0.2 lbs/MMBTU. As previously notified, PTA's initial test results from May 14, 2020 showed a three-test average emission rate of 1.34 lbs/ MMBTU.

On June 22, 2020, PTA submitted correspondence in accordance with its permit, and Rule 912(5), providing further details on the cause of the malfunction, based on subsequent investigation. The suspect cause of the malfunction was landfill gas pressure fluctuation caused by condensate accumulation in the delivery header piping. Following correction, PTA retested the flare on June 18, 2020 and demonstrated compliance.

As EGLE is aware, Enclosed Flare #6 is operated currently in a reserve capacity, as a back-up control for landfill gas that is not consumed by the renewable energy plants. Documentation provided in PTA's annual emission inventory shows that Enclosed Flare #6 is offline 99% of the time. These dormant conditions often pose an operational challenge, particularly with underground piping and condensate management. Consequently, PTA has updated its Malfunction Abatement Plan (MAP) for the Enclosed Flares in response to this recent deviation. Specifically, PTA's MAP now includes inspection of components upstream of the enclosed flares (e.g. pump station and control valves) for evidence of excess condensate upon start up following extended shutdown periods. PTA is confident that these measures will prevent a reoccurrence of this flare malfunction.

Please contact me at (586) 634-8085 with any questions you may have regarding this correspondence.

Sincerely,

Steve Walters

Steve Walters
District Engineer
Pine Tree Acres, Inc.

cc: Jenine Camilleri, EGLE