



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

April 27, 2016

Mr. Charles Cassie
Pine Tree Acres Inc.
600 West Silver Bell Road
Orion, Michigan 48359

SRN: N5984, Macomb County

Dear Mr. Cassie:

VIOLATION NOTICE

On February 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of the WMRE engine plant located at Pine Tree Acres Landfill, 36600 29 Mile Road, Lenox, Michigan. The purpose of this inspection was to observe air emission testing of the eight CAT 3520, landfill gas fueled, reciprocating internal combustion engines and to determine Pine Tree Acres Inc.'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 administrative rules, the conditions of Permit to Install (PTI) number 160-14, and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N5984-2013.

The compliance testing for FGICEENGINES (and two enclosed fares) was performed by Derenzo and Associates on February 8-18, 2016. On April 14, 2016, staff from Waste Management contacted the AQD to report that Engine #5 (EUIENGINE5) exceeded the CO emission limits of PTI No. 160-14 and ROP No. MI-ROP-N5984-2013. On April 20, 2016, the AQD received the hard copy of the Air Emission Test Report.

Upon reviewing the test report, AQD staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUIENGINE5	PTI No. 160-14 and ROP No. MI-ROP-N5984-2013, FGICEENGINES SC I.1 and SC I.2	The emission test for Engine #5, conducted on Monday, February 8, 2016, showed that Engine #5 exceeded the CO limits established in the permit. Permit Limits for CO: 3.3 g/bhp-hr and 16.3 lbs/hr Reported Test Results for Engine #5: 3.33 g/bhp-hr and 16.8 lbs/hr

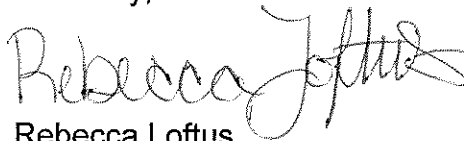
This process is also subject to the federal Standards of Performance for New Sources (NSPS) for Stationary Spark Ignition Internal Combustion Engines. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart JJJJ. Note, the permit emission limits for CO are more restrictive than the limit found in the federal regulation (5.0 g/bhp-hr).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 18, 2016 (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.

If Pine Tree Acres Inc. 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 my inspection of the WMRE Engine Plant located at Pine Tree Acres Landfill. 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,



Rebecca Loftus
Senior Environmental Quality Analyst
Air Quality Division
586-753-3735

cc/via e-mail: Mr. Steve Niehoff, Waste Management
Mr. Vic Saufley, Waste Management
Mr. Steve Walters, Waste Management
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ
Ms. Karen Kajiya-Mills, DEQ
Mr. David Patterson, DEQ