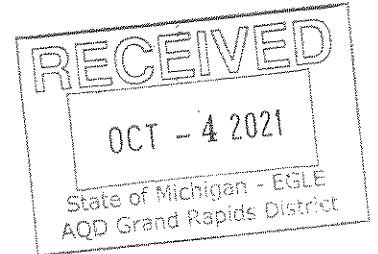




September 30, 2021

Mr. David L. Morgan
Environmental Quality Specialist
EGLE – Air Quality Division
350 Ottawa Avenue NW, Unit 10
Grand Rapids MI 49503



Subject: Response to September 10, 2021 Violation Notice
North American Natural Resources
Autumn Hills Compressor and Generating Station
State Registration Number N6006

Dear Mr. Morgan;

On behalf North American Natural Resources (NANR), Impact Compliance and Testing, Inc. (ICT) is providing this response to the Violation Notice dated September 10, 2021 for the Autumn Hills Compressor and Generating Station located in Zeeland, Ottawa County, Michigan. The Michigan Department of Environment, Great Lakes and Energy (EGLE) requested a response by October 1, 2021. This document was prepared under the direction and approval of Mr. Richard Spranger, NANR Director of Operations.

Following an inspection of the Autumn Hills Compressor and Generating Station on August 19, 2021, EGLE issued to NANR a Violation Notice (VN) specifying that the:

Company did not maintain daily records of filtration, de-watering, and compression parameters that ensure the treatment system is operating properly as outlined in the NANR site-specific monitoring plan.

This is a requirement of flexible group FGTREATMENTSYSTEM-XXX in Renewable Operating Permit MI-ROP-N6006-2018. In addition to the specified deviation, EGLE requested that NANR provide an updated monitoring plan that clearly states the operating parameters and values that indicate acceptable operation of the treatment system.

Response to Specified Violation

NANR had prepared a Preventative Maintenance Plan, which included treatment system monitoring, and a Gas Treatment System log sheet that is used by facility operators during their normal rounds to verify treatment system operation. Following its investigation after the August 19 EGLE inspection, NANR determined that the facility operator had not been recording treatment system operating parameters on the Gas Treatment System log sheet. It is unknown exactly when the operator stopped recording the data on the log sheets.

The facility operator that primarily managed the Autumn Hills Compressor and Generating Station left NANR shortly after the EGLE inspection (for unrelated reasons) and certain documents have not, as of yet, been located.

In addition to the regulatory requirements, treatment of the landfill gas that is used as fuel in the generating engines is important for proper maintenance and efficient operation of the engines. NANR is confident that the treatment system was being operated and providing gas to the engines. The incoming gas cannot be routed around the treatment system to the engines, nor would this be desirable as it would result in costly damage to the engines. However, the records indicating gas treatment operating data were not being maintained. This recordkeeping deviation was reported with the semi-annual ROP certification and deviation report submitted to EGLE on September 15, 2021.

Corrective Actions

On August 26, 2021, Justin Boone (NANR Lead Operator) provided EGLE with an e-mail message that contained recorded Gas Treatment System operating data beginning on August 23, 2021 with an explanation that the previous facility operator was no longer at NANR and that the monitoring sheets will be completed regularly going forward.

As a result of this incident, NANR management staff will review these records on a regular basis and have asked ICT to review these records on a regular basis (at least semi-annually) as third-party verification.

Attachment 1 provides the Gas Treatment System operating data attached to the August 26, 2021 e-mail message.

Monitoring Plan Revisions

As requested by EGLE, the monitoring plan has been updated to provide additional information and specific operating ranges for:

- Initial Scrubber / Filter differential pressure and liquid level
- Gas Compressor discharge temperature and pressure
- Air-Gas Cooler outlet temperature
- Oil / Water Separator liquid level
- Chiller / Dryer temperature

The Gas Treatment System log sheet has been modified slightly from those submitted to EGLE with the August 26 e-mail such that the information recorded is consistent with the revised plan.

Attachment 2 provides a copy of the revised monitoring plan, which is now titled "Treatment System Operating Plan and Preventative Maintenance Plan".

Impact Compliance & Testing

Mr. David Morgan
EGLE Air Quality Division

Page 3
September 30, 2021

We appreciate EGLE's consideration of the information presented in this letter in response to the issued VN. If you have any comments or requests relative to the proposed corrective actions, please contact us at (517) 481-3170 or Rob.Harvey@ImpactCandT.com.

Sincerely,

IMPACT COMPLIANCE AND TESTING, INC.



Robert L. Harvey, P.E.
Service Director

NORTH AMERICAN NATURAL RESOURCES



Richard Spranger
Director of Operations

cc: Ms. Jenine Camilleri – EGLE