



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GAYLORD FIELD OFFICE



DAN WYANT  
DIRECTOR

July 21, 2014

Mr. Todd R. Mall  
Trendwell Energy Corporation  
P.O. Box 560  
Rockford, MI 49341

SRN: N6150, Montmorency County

Dear Mr. Mall:

**VIOLATION NOTICE**

Staff from the Department of Environmental Quality (DEQ), Air Quality Division (AQD), recently conducted an inspection and received and reviewed records from the Vienna 31 CPF located at NW NE SE Section 31, T30N, R1E Vienna Township, Montmorency County, Michigan. The purpose of this inspection and records review was to determine Trendwell Energy Corporation'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; and the conditions of Permit to Install (PTI) number 708-96B.

During the inspection and records review, staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE2 Caterpillar 399	PTI 708-96B, FGENGINES, 1.3	The calculated NOx emissions for 2013 exceeded the permitted NOx limit.

Records provided for EUENGINE2 included:

- January 2014 12-month rolling fuel usage – 41026.00 Mcf (41.026 MMCF)
- Exterran Engine Emission Analysis NOx Conversion – 21.8% control (78.2% emitted);

Records provided with the 2013 MAERS submittal included:

- Engine Parameter NOx Emission Factor Uncontrolled – 2194.17 Lb/MMcf

Copies of the records are enclosed.

Using the records provided by Trendwell Energy, the NOx emissions from EUENGINE2 were calculated by AQD staff. The AQD determined the 2013 actual NOx emissions

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from EUENGINE2 were 35.2 tons, which exceed the permitted NOx emissions of 9.32 tons.

This is the NOx calculation:

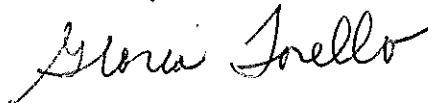
$$41.026 \text{ MMCF} \times 0.782 \times 2194.17 \text{ lb/MMCF} / 2000 \text{ lbs} = 35.2 \text{ tons NOx}$$

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 11, 2014 (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 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.

If Trendwell Energy Corporation believes the above observations or statements are inaccurate or do not constitute a violation 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 this review. If you have any questions regarding this violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Gloria Torello  
Environmental Quality Analyst  
Air Quality Division  
989-705-3410

Enclosure(s)

cc/via email: Ms. Danita Green, Trendwell Energy Corporation  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
cc: Ms. Janis Ransom, DEQ