



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

August 9, 2016

Jon Stoppels, City of Eaton Rapids Manager
City of Eaton Rapids Electric Department
200 S. Main Street
Eaton Rapids, MI 48827

SRN: P0725, Eaton County

Dear Mr. Stoppels:

VIOLATION NOTICE

On June 23, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of the City of Eaton Rapids Electric Department located at 300 Market Street, Eaton Rapids. The purpose of this inspection was to determine the City of Eaton Rapids Electric Department'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 Federal Maximum Achievable Control Technology (MACT) National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Fairbanks Morse 38DD8-1/8, 13 MMBTU/hr dual-fuel fired engine	Rule 201 and Rule 285(g)	Installation of an engine greater than 10 MMBTU/hr maximum heat input without a permit to install.
Fairbanks Morse 38DD8-1/8, 13 MMBTU/hr dual-fuel fired engine	40 CFR 63.63.6612(a) and 40 CFR 63.6595(a)(1) (RICE MACT ZZZZ)	Initial performance test was not conducted within 180 days of the May 3, 2013 compliance date. Initial performance test conducted on June 1, 2016.
Fairbanks Morse 38TDD8-1/8, 18.9 MMBTU/hr dual-fuel fired engine	Rule 201 and Rule 285(g)	Installation of an engine greater than 10 MMBTU/hr maximum heat input without a permit to install.
Fairbanks Morse 38TDD8-1/8, 18.9 MMBTU/hr dual-fuel fired engine	40 CFR 63.63.6612(a) and 40 CFR 63.6595(a)(1) (RICE MACT ZZZZ)	Initial performance test was not conducted within 180 days of the May 3, 2013 compliance date. Initial performance test conducted on June 1, 2016.

DEQ Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant. During this inspection, it was noted that the City of Eaton Rapids Electric Department had installed unpermitted equipment at this facility. The AQD staff advised the City of Eaton Rapids Electric Department on July 18, 2016, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the two Fairbanks Morse dual fuel-fired engines. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at the following website:

<http://www.michigan.gov//deq/0,4561,7-135-3310---,00.html>

Additionally, it was noted that the initial performance test required under the Reciprocating Internal Combustion Engine MACT Subpart ZZZZ was not conducted within the 180 days following the compliance date of May 3, 2013, for existing sources. Please be aware that future performance tests must be conducted every 8760 hours or every 3 years, whichever comes first.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 30, 2016. 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 recurrence.

If the City of Eaton Rapids 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 City of Eaton Rapids Electric Department. If you have any questions regarding the violations or the actions

necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle M. Luplow". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-284-6636

ML:TG

cc/via e-mail: Mr. Jon Flower, City of Eaton Rapids Electric Department
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ