



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

January 31, 2020

Ms. Emily Zambuto
Manager of Environmental Programs
Aria Energy
2999 Judge Road
Oakfield, NY 14125

SRN: N5984, Macomb County

Dear Ms. Zambuto:

VIOLATION NOTICE

On January 15, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), performed U.S. EPA Method 9-Visual Determination of the Opacity of Emissions from Stationary Sources at Sumpter Energy Associates, LLC located at 36450 29 Mile Road, Lenox Township, Michigan. The purpose of this measurement was to determine Sumpter Energy Associates', LLC 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 conditions of Renewable Operating Permit (ROP) number MI-ROP-N5984-2019.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-ICENGINE2	General Condition 13, MI-ROP-N5984-2019 R 336.1301(1)(a)	A 6-minute average of 20%, except for one 6-minute average per hour of not more than 27%. Visible emissions observed averaged 100% opacity for 6 minutes in one hour.

During this measurement, it was observed that FG-ICENGINE2 (EU-ICENGINE 8) processes were emitting visible emissions with opacity in excess of emissions allowed by Rule 301 of the administrative rules promulgated under Act 451.

Enclosed are copies of the instantaneous and six-minute average readings taken at Sumpter Energy Associates, LLC.

Ms. Emily Zambuto
Aria Energy
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 21, 2020 (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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Sumpter Energy Associates, LLC 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.

If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Joseph
Environmental Engineer
Air Quality Division
586-506-9564

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE

VISIBLE EMISSION OBSERVATION FORM

No.

COMPANY NAME
Simpler Energy Associates, LLC

STREET ADDRESS
36450 29 Mile Road

CITY
Lenox Township

STATE
MI

ZIP
48048

PHONE (KEY CONTACT)
585-278-4773

SOURCE ID NUMBER
N5984 (N 8004)

PROCESS EQUIPMENT
FG-ENGINE (Engine #8)

OPERATING MODE

CONTROL EQUIPMENT
Self-adjusting Air/Fuel ratio

OPERATING MODE

DESCRIBE EMISSION POINT
Emission point visible for end of stack height.

HEIGHT ABOVE GROUND LEVEL
Start >40 ft

HEIGHT RELATIVE TO OBSERVER
Start >40 ft End >40 ft

DISTANCE FROM OBSERVER
Start 35 ft End 35 ft

DIRECTION FROM OBSERVER
Start West End West

DESCRIBE EMISSIONS
Start Attached Steam Plume End Attached Steam Plume

EMISSION COLOR
Start White End White

IF WATER DROPLET PLUME
Attached Detached

POINT IN THE PLUME AT WHICH OPACITY WAS DETERMINED
Start stack end End stack end

DESCRIBE PLUME BACKGROUND
Start P. Cloudy End P. Cloudy

BACKGROUND COLOR
Start End

SKY CONDITIONS
Start P. Cloudy End P. Cloudy

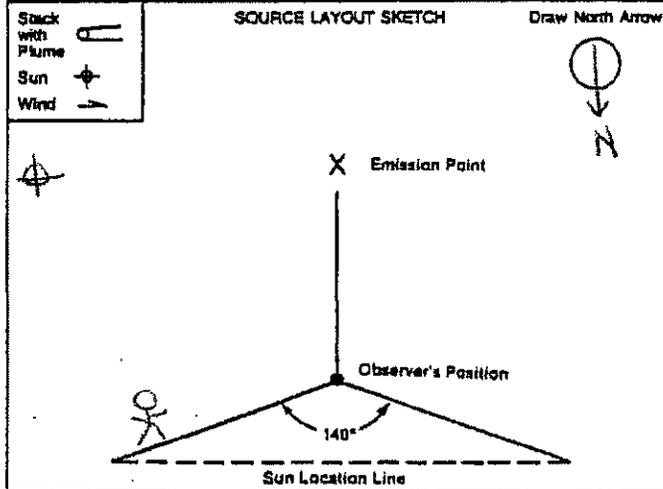
WIND SPEED
Start 7 mph End 7 mph

WIND DIRECTION
Start East End East

AMBIENT TEMP
Start 37°F End 37°F

WET BULB TEMP
N/A

RH, percent
N/A



ADDITIONAL INFORMATION
Turbo charger of engine ultimately failed and emitted a plume of black smoke for 1 minute

OBSERVATION DATE		START TIME				END TIME
01/15/20		10:18 a.m.				10:24 a.m.
SEC	0	15	30	45	COMMENTS	
MIN						
1	100	100	100	100	87% transmiss. Hence ↓	
2	100	100	100	100		
3	100	100	100	100		
4	100	100	100	100		
5	100	100	100	100		
6	100	100	100	100		
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OBSERVER'S NAME (PRINT)
Robert Joseph

OBSERVER'S SIGNATURE
Robert Joseph

DATE
01/15/20

ORGANIZATION
EGLE-ARD

CERTIFIED BY
Eastern Technical Associates

DATE
10/10/19

CONTINUED ON VEO FORM NUMBER