



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 26, 2021

Mr. Dan Zimmerman, Director of North American HSE and Compliance
Energy Developments, LLC
608 South Washington Avenue
P.O. Box 15217
Lansing, Michigan 48901

SRN: N5991, Genesee County

Dear Mr. Dan Zimmerman:

VIOLATION NOTICE

On May 14, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the renewal application for Renewable Operating Permit (ROP) No. MI-ROP-N5991-2016, Section 2, for Energy Developments Grand Blanc located at Republic Services of Michigan I, LLC-Citizens Disposal, 2361 West Grand Blanc Road in Grand Blanc, Michigan. The AQD staff has reviewed the application and has determined the application is not administratively complete, pursuant to Section 5507, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, (Act 451).

As required by Rule 210(2), this letter is to notify you of this finding and to specify the discrepancies and all supplemental materials needed for an administratively complete application from the facility. The application is deficient for the following reason(s):

Part E. No.E4 should have been marked with a "Yes" regarding EUENGINECITB(16). On January 25, 2017, a notice of change per Rule 215(1) was received for the shutdown and removal by January 31, 2017 of EUENGINECITB(16).

Part H. No.H3 should have been marked with a "Yes" regarding EUENGINE5. On February 1, 2017, a notice of change per Rule 215(3) was received for the installation of a new emission unit in Bay 5 of EUENGINE5 (CAT Model 3516 LE, manufacture date: 1995). EUENGINE5 is subject to 40 CFR 63, Subpart ZZZZ as a new Reciprocating Internal Combustion Engine (RICE). Bay 5 was empty for longer than 18-months and any emission unit installed in the bay is a new emission unit. EUENGINE5 was installed in Bay 5 as a new emission unit with an installation date of January 31, 2017. Information about EUENGINE5 was listed in No. H17 incorrectly in the ROP renewal application.

The above information should have been submitted using copies of the appropriate ROP Application forms by May 16, 2021. Certification by a Responsible Official using the Renewable Operating Permit Application C-001 (Certification) Form must be included with all submittals.

Mr. Dan Zimmerman
Energy Developments, LLC
Page 2
May 26, 2021

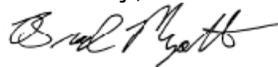
The application was received by this office after the submittal deadline pursuant to Rule 210(9). As a result, this facility has failed to obtain an application shield. Operation of the process or process equipment without the benefit of the application shield constitutes a violation of Rule 210(1).

Furthermore, on November 16, 2021, ROP No. MI-ROP-N5991-2016 will expire. In accordance with Rule 217(1)(c), the source will lose its "permit shield" upon expiration of the ROP. In addition, according to Section 5506(2) of Act 451, the expiration of an operating permit terminates the person's right to operate a source. Therefore, if the ROP renewal is not issued by November 16, 2021, and this source continues to operate after this date, this will be in violation of Section 5506(2) of Act 451.

If you believe 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.

The AQD may require additional information as the technical sections of the application are reviewed. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact Ms. Julie Brunner at 517-275-0415, or you may contact me at the number listed below.

Sincerely,



Brad Myott
Lansing District Supervisor
Air Quality Division
517-294-9394

Email/cc: Mr. Dan Zimmerman, EDL
Mr. Khaled Mahmood, Tetra Tech
Mr. Robb Moore, Republic Services
Ms. Julie Brunner, EGLE

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