



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 16, 2019

Mr. Dan Zimmerman, Director of North America HSE & Compliance  
Energy Developments, LLC  
608 South Washington Avenue  
Lansing, Michigan 48833

SRN: N5997, Clinton County

Dear Mr. Zimmerman:

**VIOLATION NOTICE**

A recent file review of Michigan Air Emissions Reporting System (MAERS) reporting data was conducted in response to Granger Wood Street Landfill and Energy Developments, LLC's (EDL) application to install additional flares and a Renewable Natural Gas plant. In particular, the emissions reported on March 13, 2017, for the 2016 emissions reporting year for the Granger Wood Street Landfill and EDL's gas-to-energy plant, located at 16980 Wood Road, Lansing, Michigan were reviewed. The 2016 emissions information indicates the following issues with respect to the emission units operating at the gas-to-energy plant under Renewable Operating Permit number MI-ROP-N5997-2013:

Process Description	Rule/Permit Condition Violated	Comments
EUICEENGINE1-S1  Caterpillar 3520C landfill gas-fired reciprocating internal combustion engine.	Rule 201 (R 336.1201)	The information provided in the MAERS report demonstrate that the actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the engine have increased.
EUICEENGINE2-S1  Caterpillar 3520C landfill gas-fired reciprocating internal combustion engine.	Rule 201 (R 336.1201)	The information provided in the MAERS report demonstrate that the actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the engine have increased.
EUICEENGINE3-S1  Caterpillar 3520C landfill gas-fired reciprocating internal combustion engine.	Rule 201 (R 336.1201)	The information provided in the MAERS report demonstrate that the actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the engine have increased.
EUICE1-S1  Caterpillar 3516 landfill gas-fired reciprocating internal combustion engine.	Rule 201 (R 336.1201)	The information provided in the MAERS report demonstrate that the actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the engine have increased.

EUICE2-S1  Caterpillar 3516 landfill gas-fired reciprocating internal combustion engine.	Rule 201 (R 336.1201)	The information provided in the MAERS report demonstrate that the actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the engine have increased.
EUICE3-S1  Caterpillar 3516 landfill gas-fired reciprocating internal combustion engine.	Rule 201 (R 336.1201)	The information provided in the MAERS report demonstrate that the actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the engine have increased.
EUICE4-S1  Caterpillar 3516 landfill gas-fired reciprocating internal combustion engine.	Rule 201 (R 336.1201)	The information provided in the MAERS report demonstrate that the actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the engine have increased.

For emissions reporting year 2012, it appears that site-specific data in conjunction with AP-42 values were used to determine SO<sub>2</sub> emissions from the seven landfill gas engines. Emissions reported for the 2016 emissions reporting year for these engines were based on gas samples that were collected May 31, 2016, which is approximately 4 times the site specific/AP-42 concentrations reported in 2012. Please be advised that potential emissions of SO<sub>2</sub> could be greater than 40 tons per year, which exceeds the significant threshold and may trigger New Source Review (NSR) for a major modification.

At a minimum, this is a violation of Rule 201 of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

Since the increase in total sulfur in the landfill gas is considered a change in the method of operation, and affects the exempt equipment at the facility, the four (4) 3516 engines, the three (3) 3520 engines, and the 1,300 scfm flare are part of the project and require permitting, per Rule 201. Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or modification of any process or process equipment which may be a source of an air contaminant.

A program for compliance shall include a completed PTI application for the four (4) 3516 Caterpillar engines and the three (3) 3520 Caterpillar engines.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 6, 2019, (which coincides with 21 calendar days from the date of this letter). 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

Mr. Dan Zimmerman  
Energy Developments  
Page 3  
October 16, 2019

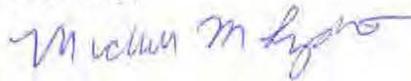
be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Lansing District Office, at Constitution Hall, 525 W. Allegan, First Floor South, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

Thank you for your attention to resolving the violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



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

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