



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

February 27, 2020

Mr. Robb Moore  
Environmental Manager  
Oakland Heights Development, Inc.  
2350 Brown Road  
Auburn Hills, MI 48326

SRN: N6008, Oakland County

Dear Mr. Moore:

**VIOLATION NOTICE**

On December 24, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a letter via email from Oakland Heights Development, Inc. requesting an alternative timeline for gas well (40A2) located at 2350 Brown Road, Auburn Hills, Michigan, 48326. Approval for such a request is required as outlined in the facility's Renewable Operating Permit (ROP) number MI-ROP-N6008-2015a, and the Standards of Performance for Municipal Solid Waste Landfills codified under 40 CFR 60, Subpart WWW.

During review of the gas well data staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUALGCS	MI-ROP-N6008-2015a Special Condition IV.4  40 CFR 60.755(a)(5)	Gas well exceeded an oxygen concentration of 5% for at least 45 days from July 1 to August 15, 2019, without AQD approval.

This process is also subject to the federal Standards of Performance for New Sources (NSPS) for Municipal Solid Waste Landfills. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart WWW.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 19, 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.

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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 Oakland Heights Development, Inc. 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