



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



LIESL EICHLER CLARK
 DIRECTOR

GRETCHEN WHITMER
 GOVERNOR

October 28, 2019

Ms. Stevia Smith, Sr. Environmental Compliance Specialist
 Ameresco Woodland Meadows Romulus, LLC
 4620 Hannan Road
 Canton Twp., MI 48184

SRN: P0317, Wayne County

Dear Ms. Smith:

VIOLATION NOTICE

On September 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a letter from Ameresco Woodland Meadows Romulus, LLC located at 4620 Hannan Road, Canton Twp., Michigan. Also, the AQD received a revised Annual Compliance Certification and a revised Semi-Annual Report Certification dated September 26, 2019. Staff reviewed the deviation reports to determine Ameresco'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 conditions of Permit to Install (PTI) number 61-16.

Based on a review of the letter and revised deviation reports, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUHBTUENCL -- A 2,600 CFM enclosed flare used for the destruction of the process CO ₂ tail gas stream.	PTI 61-16 EUHBTUENCL Special Condition III.2	The facility failed to properly calibrate the temperature monitoring device. This device is required to be calibrated at least once per year. Approximately 22 months passed between the installation of the device in November 2017 and annual calibration in September 2019.

In the letter dated September 12, 2019 Ameresco reported that a failure to calibrate the temperature monitoring device had occurred. This is a violation of Special Condition III.2 of PTI number 61-16. Ameresco installed the device in November 2017 when the flare was installed. On September 10, 2019 Ameresco realized that the device had not been

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calibrated since it was installed. The device was required to be calibrated at least once per calendar year.

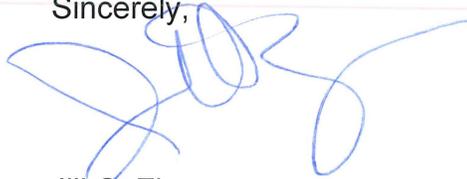
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 18, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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, Detroit District, at 3058 West Grand Boulevard Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ameresco 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 violation cited above. 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,



Jill C. Zimmerman
Environmental Engineer
Air Quality Division
313-456-4689

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jeff Korniski, EGLE
Mr. Jonathon Lamb, EGLE