



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYHER
DIRECTOR

August 2, 2016

Mr. Greg Northrup, Managing Partner
Lowell Energy AD LLC
P.O. Box 68073
Grand Rapids, Michigan 49516

SRN: P0375, Kent County

Dear Mr. Northrup:

VIOLATION NOTICE

On July 22, 2016, the Department of Environmental Quality (DEQ), Air Quality Division, received notification from Lowell Energy AD LLC that on January 6, 2015, the facility started operation of a 800 kW combined heat and power engine located at 625 Chatham, Lowell, Michigan.

Lowell Energy AD LLC previously submitted notification that the facility, consisting of a digester and 800 kW engine was exempt from the requirements to obtain a permit to install under the Part 2 Exemptions. Lowell Energy AD LLC also provided notification that the engine met the requirements of 40 CFR Part 60, Subpart JJJJ as certified by the manufacturer. It has recently been determined that the engine is not certified by EPA as conforming with the emission standards of Subpart JJJJ, and therefore, was required to have performance testing conducted within one year after startup.

At this time, Lowell Energy AD LLC has not conducted the required performance testing and is therefore in violation of 40 CFR Part 60, Subpart JJJJ.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 23, 2016 (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.

If Lowell Energy AD 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.

Mr. Greg Northrup
Lowell Energy AD LLC
Page 2
August 2, 2016

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,

A handwritten signature in black ink, appearing to read "Eric Grinstern", with a long horizontal flourish extending to the right.

Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-356-0266

cc: Ms. April Lazzaro, DEQ
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ