



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

May 17, 2024

Raymond Ivers
Energy Developments Coopersville, LLC
2501 Coolidge Road, Suite 100
East Lansing, Michigan 48823

SRN: N3294, Ottawa County

Dear Raymond Ivers:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the 2023 Renewable Operating Permit (ROP) semi-annual and annual compliance reports for Energy Developments Coopersville, LLC (EDC) located at 15362 68th Avenue, Coopersville, Michigan. The purpose of these reports is to report EDC'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 ROP number MI-ROP-N3294-2024.

During the review of these reports, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Landfill Gas (LFG) Treatment System (EUTREATSYS1)	MI-ROP-N3294-2024, Section 2 FGTREATMENTSYS-XXX, Special Condition (SC) III.1 (40 CFR 60.762(b)(2)(iii)(C)) and FGTREATMENTSYS-AAA, SC III.2 (40 CFR 63.1959(b)(2)(iii)(C))	The facility noted 13 five (5) minute occurrences when treated LFG was vented to ambient air through a release valve.

The ROP semiannual and annual compliance reports noted that during the first half of 2023, EDC discovered treated LFG was being vented to the atmosphere through a release valve located between the Plant 1 treatment system and the engines. EDC identified 9 occasions when LFG was released during the first half of 2023 (2/17/23, 3/6/23, 3/7/23, 3/21/23, 4/26/23, 4/28/23, 5/23/23, 6/19/23, and 6/22/23) and 4 occasions during the second half of 2023 (8/25/23, 10/16/23, 11/1/23, and 11/9/23). The facility conservatively estimated each event to have lasted no more than five (5) minutes. EDC determined that the issue was initially caused by high oxygen in the LFG being combusted in the engines. The high oxygen caused the engines to shut down, allowing the residual treated LFG in the fuel line to be vented through the release valve.

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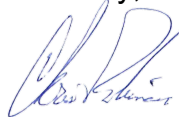
To prevent this from reoccurring, EDL installed a 140 scfm Solar flare on December 14, 2023, under Rule 201 permitting exemption Rule 285(2)(aa). A PTI applicability determination, which included a Potential to Emit demonstration, was provided to the AQD on May 15, 2024.

The 13 releases were not controlled in accordance with the ROP or the applicable federal regulatory requirements noted in the table above, which specify that "venting of treated LFG to the ambient air is not allowed." Because EDC has already implemented corrective action by installing the Solar Flare under Exemption Rule 285(2)(aa) and providing a Permit to Install applicability demonstration, a response to this violation notice is not required.

If EDC 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 violations cited above. If you have any questions regarding the violations, please contact me at the number listed below.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Robinson".

Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-286-0083

cc: Meghan Stackhouse, EDL Energy
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE