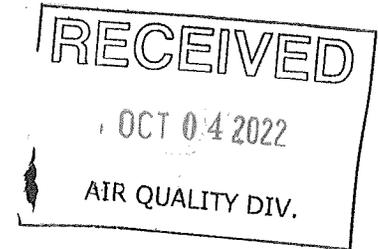




September 29, 2022

Ms. Lindsey Wells
Technical Programs Unit
EGLE-AQD
Constitution Hall, 2nd Floor South
525 West Allegan Street
Lansing, MI 48933



RE: September 13, 2022, Violation Notice – Quarterly Assurance Miss 2nd Quarter

Ms. Wells,

Guardian Industries, LLC – Carleton is submitting the enclosed response to the Violation Notice issued by the Department of Environment, Great Lakes, and Energy (EGLE) dated September 13, 2022, relating to a missed quarterly quality assurance cylinder gas audit for the period of April 1, 2022 – June 30, 2022. Guardian Industries – Carleton self-reported the missed quarterly quality assurance cylinder gas audit (CGA) for the period of April 1, 2022 – June 30, 2022, in its 2nd Quarter Excess Emissions and Summary Report, dated July 26, 2022.

Guardian did not complete a cylinder gas audit in 2Q 2022 due to schedule changes associated with the facility relative accuracy test audit (RATA) for Carleton Line 1 operations. Guardian Industries – Carleton originally scheduled the RATA for the week of June 27, 2022, with the expectation that the required testing would be completed before the end of June. A RATA satisfies the quarterly CGA requirement in the quarter it is completed; however, equipment disruptions delayed the intended commencement of the Line 1 RATA until July 1, 2022. This resulted in a missed quality assurance audit for the period of April 1, 2022 – June 30, 2022. The successful completion of the RATA on July 1, 2022, and subsequent CGA, demonstrates that the Line 1 CEMS is operating consistent with applicable requirements.

Guardian Industries – Carleton resolved the violation and has implemented the following actions to prevent a reoccurrence:

- Annual RATA scheduled with adequate time prior to the end of the quarter (approx. 2 – 3 weeks)
- Compliance calendar reminder notification of quarterly assurance (CGA) requirements.

Please contact Mr. Benjamin Kroeger at (734) 654-4252 or Benjamin.kroeger@guardian.com, if you have any questions or need further assistance.

Regards,


James Martin

cc: Ms. Jenine Camilleri