



November 20, 2024

Ms. Emily Crimmins
Environmental Quality Analyst, Air Quality Division
401 Ketchum Street, Suite B
Bay City, MI 48708

Re: Goma RNG, LLC (PTI 49-21A)
Response to Violation Notice P1192

File: 2884.002.024

Dear Ms. Crimmins:

Barton & Loguidice (B&L), on behalf of Goma RNG, LLC, is submitting this response to the Violation Notice the facility received on November 1st, 2024. As stated in this Notice, during an inspection of the facility on September 6th, 2024, it was found that the facility is not in compliance with Special Condition IV.2. for the EUGCU as the facility did not have a device specifically located at the tail gas vent to measure the volumetric flow rate of the vent gas. While B&L provided a letter to the Department on October 11th to explain how the facility is using mass balance to calculate this flow rate using continuous measurements from other measured parameters at the facility, the Department expressed in this Notice that calculation via mass balance does not fulfill the permit obligation to have a device installed to monitor this flow rate.

While it is understood that a Violation Notice cannot be withdrawn, B&L and the Goma facility believe that this Notice was unwarranted. The facility and B&L were having discussions via email, Zoom, and phone calls with the inspector who inspected the facility in September prior to issuance of this Violation Notice. The facility was under the impression that these talks were ongoing, as well as being discussed internally within EGLE. It was explained during these discussions, as well as in a technical memo provided to the inspector, that the facility does monitor the flow rate of the tail gas through mass balance. The parameters used in this mass balance are taken from continuous monitoring points of other flows and methane content of the gas throughout the process; of importance, these data points are measured using calibrated measuring devices. Mathematically, this calculation is not any less accurate than installation of a device to monitor flow rate of the tail gas, as flow meters also use indirect methods of measuring the flow rate (for example, measurement of differential pressure, frequency shift, heat transfer, etc., and mathematically calculating the flow rate). It is also very important to highlight that as outlined in this Violation Notice, the facility was told that recent permits for similar facilities do not include this monitoring condition if the tail gas flow rate is limited by the equipment specifications and cannot be manually exceeded. This language is clearly articulated in the facility's original PTI application, and the maximum possible tail gas flow rate was used in the PTE calculations to indicate the maximum possible emissions at this flow rate. As such, this tail gas monitoring condition was included in the PTI for the Goma facility and is not required in other similar facilities.



On this note, Gina McCann communicated to the facility via email that corrective action to this Notice can include a modification to this permit, as more recent permits for facilities of this type do not include this monitoring requirement. As such, the facility will be taking this route to correct this Violation. The facility plans to submit a permit modification to remove this monitoring requirement; with this modification, the facility will re-submit the emissions calculations showing this maximum flow rate in the PTE calculations. The facility anticipates submittal of this modification by the end of the month.

If you have any questions or would like additional information, please do not hesitate to contact me or Margo Carr, Environmental Manager of the Goma RNG facility.

Sincerely,

BARTON & LOGUIDICE, D.P.C.



William F. Doeblen IV, QEP
Associate

DAP/jms

cc: Margo Carr, SJI
Pat Troy, RevLNG
Jenine Camilleri, EGLE