



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

November 1, 2024

VIA EMAIL ONLY

Patrick Troy
RevLNG, LLC
7675 Omnitech Place #190
Victor, New York 14564

SRN: P1192, Sanilac County

Dear Patrick Troy:

VIOLATION NOTICE

On September 6, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Goma RNG, LLC located at 3875 Aitken Road, Marlette, Michigan. The purpose of this inspection was to determine Goma RNG, LLC'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 49-21A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUGCU	Permit to Install No. 49-21A, EUGCU, Special Condition (SC) IV.2	Failed to install, maintain, and operate a device to monitor the volumetric flow rate of the tail gas vented from the EUGCU

During the inspection on September 6, 2024, it was observed that staff from Goma RNG, LLC were unable to locate the device that measured the volumetric flow rate of tail gas venting from the Gas Cleaning Unit (EUGCU). In a letter dated, October 11, 2024, it was confirmed the data requested for Special Condition (SC) IV.2 was calculated offsite and providable for the records request.

This is a violation of the design and equipment parameters specified in EUGCU, Special Condition IV.2 of PTI number 49-21A. The permit condition requires the facility to install, calibrate, maintain, and operate in a satisfactory manner, a device to monitor and record the volumetric flow rate of tail gas vented from EUGCU, on a continuous basis.

As stated in the October 11, 2024 letter, the facility is calculating the volumetric flow rate of tail gas through a mass balance equation, not a device to monitor the volumetric flow rate.

Patrick Troy
RevLNG, LLC
Page 2
November 1, 2024

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 22, 2024 (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 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 Emily Crimmins at EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or CrimminsE@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Goma RNG, 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.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Goma RNG, LLC. 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 that reads "Emily Crimmins". The signature is written in a cursive, flowing style.

Emily Crimmins
Environmental Quality Analyst
Air Quality Division
989-598-9932

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Gina McCann, EGLE