

VIA EMAIL

Ms. Michelle Luplow  
Environmental Quality Analyst  
EGLE – Air Quality Division  
Constitution Hall, 1<sup>st</sup> Floor, South  
525 W. Allegan Street  
P.O. Box 30242  
Lansing, MI 48909-7742

May 18, 2023

**RE: Response to EGLE Violation Notice dated May 4, 2023  
De Saegher Energy, LLC (SRN: P1256)**

Dear Ms. Luplow:

On May 4, 2023, you issued a Violation Notice to De Saegher Energy, LLC (De Saegher) indicating that the facility had not submitted a 2022 air pollution report required by a source of emissions to supply information on the quantity and composition of air contaminants emitted from the source.

De Saegher was issued Permit to Install (PTI) No. 94-22 on July 12, 2022 and is in the process of commissioning the facility. Accordingly, the units identified in PTI No. 94-22 did not operate during calendar year 2022 and were not considered a source of actual “emissions of an air contaminant” as the quantity of emissions was zero. We do not believe this is a violation of R 336.202, as there were not air emissions from the facility to quantify for the annual report.

Regardless, at the request of the Michigan Department of Environment, Great Lakes, and Energy (EGLE), we have entered emission unit information into the Michigan Air Emissions Reporting System (MAERS) and completed the Supplemental Control Template (SCT). The MAERS reports a quantity of 0 emissions as the facility did not operate in 2022.

The MAERS and SCT were submitted on May 18, 2023, as requested in your May 4, 2023 letter.

Please contact me if you have questions.

Sincerely,



Dana Kirk, Ph.D, P.E.  
De Saegher Energy, LLC

Enclosures

cc: Mr. Bart De Saegher, De Saegher Energy, LLC  
Ms. Annette Switzer, P.E., EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Brad Myott, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Bob Byrnes, EGLE  
Mr. Eric Marko, NTH