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EGLE - Mailroom

November 15, 2024

Michelle Luplow
Environmental Quality Analyst
Air Quality Division
Department of Environment, Great Lakes, and Energy
Lansing District Office

Subject: Response to Violation Notice SRN: P1352, Ingham County

Dear Ms. Luplow,

We are writing in response to the Violation Notice dated November 7, 2024, regarding the inspection conducted by the Department of Environment, Great Lakes, and Energy (EGLE) at Lion Labs LTD. We appreciate the detailed observations provided and your assistance in identifying areas for improvement in our recordkeeping and compliance with PTI No. 41-23 requirements.

To address the cited violations, we are committed to the following corrective actions, which we will have in full compliance by the end of this month:

1. Monitoring and Recordkeeping Adjustments:

We are implementing new recordkeeping procedures to ensure monthly and 12-month rolling calculations for VOC emissions, as specified in Special Conditions VI.2.d and VI.2.e of PTI No. 41-23. Our team will utilize the method outlined in Appendix A of the permit to calculate VOC emissions, ensuring both monthly and 12-month totals are accurately documented. This approach will provide better tracking and help us maintain compliance with emission limits.

2. Material Usage Records for LPG and Ethanol:

Lion Labs is revising its material usage tracking system to maintain records of actual monthly and 12-month rolling usage for LPG and ethanol, instead of relying solely on purchase records. This update will allow us to accurately monitor our usage in accordance with Special Conditions VI.2.a and VI.2.b and support compliance with the Material Limits specified in II.1 of PTI No. 41-23.

3. Application for Increased LPG Limit:

Given the operational requirements at our facility, we are preparing to submit a request to EGLE to modify our Permit to Install (PTI) to increase the allowable 12-month rolling limit for LPG usage. This adjustment will help us align our permit limits with our actual usage while remaining committed to environmental compliance.

We are confident that all corrective actions will be fully implemented by November 30, 2024. Please feel free to contact me at (248) 231-0753 or Ryan@LionLabsBrands.com should you need further clarification on any of the corrective actions outlined above or require additional information.

Thank you for your guidance and assistance in helping us bring our facility into full compliance.

Sincerely,
Ryan Ratzloff
Lion Labs LTD