



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 15, 2024

VIA EMAIL

Bart De Saegher, Owner
De Saegher Energy, LLC
8068 West Buchanan Road
Middleton, Michigan 48856

SRN: P1256, Gratiot County

Dear Bart De Saegher:

VIOLATION NOTICE

On August 8, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of De Saegher Energy, LLC located at 8068 W Buchanan, Middleton, Michigan. The purpose of this inspection was to determine De Saegher Energy'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 94-22.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUGCU	PTI No. 94-22, Design/Equipment Parameters, SC 1.	A device to monitor the H2S content at the outlet of the primary H2S removal vessels (located following the blending skid) was not installed, calibrated, maintained, and operated in a satisfactory manner.
EUGCU	PTI No. 94-22, Monitoring/Recordkeeping SC VI.2	H2S concentration in the conditioned gas stream is not being recorded at the monitor following the blending skid, where the gas exits the primary H2S removal vessels.

During this inspection, it was noted that the H2S monitor, which was installed where the gas exits the primary H2S removal vessels of EUGCU (following the blending skid), was not reading H2S concentration accurately. The monitor was reading 82 ppm, which De Saegher staff noted is an inaccurate value due to the monitor "package" that was installed for reading H2S pre- and post-treatment. Because this monitor is not reading H2S accurately, the monitor is therefore not installed, calibrated, maintained and operated in a satisfactory manner. This is a violation of the Design/Equipment Parameters specified in Special Condition IV.1 of PTI No. 94-22, which requires that a device to monitor the H2S content at the outlet of the primary H2S removal vessels (located following the blending skid), be installed, calibrated, maintained and operated in a satisfactory manner.

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Records of the H₂S concentration in the treated gas were reviewed from August 22, 2023, through August 8, 2024. The H₂S concentration records submitted were based on H₂S readings recorded at

De Saegher's H₂S sales meter, which is not located following the blending skid. This is a violation of the Monitoring/Recordkeeping Special Condition VI.2 of PTI No. 94-22, which requires that the H₂S concentration be monitored and recorded following the blending skid, where the gas is exiting the primary H₂S removal vessels.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 5, 2024, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 Michelle Luplow at EGLE, AQD, Lansing District, at 525 West Allegan Street, First Floor South, Lansing, Michigan 48893 or LuplowM1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If De Saegher Energy 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 violations cited above and for the cooperation that was extended to me during my inspection of De Saegher Energy. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-294-9294

cc: Paul Harrah, Taurus Biogas
Maria Barrios, SKS Green
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE