

MRP Properties Company, LLC.

DEQ-AQD

JUN 06 2022

SAGINAW BAY

May 31, 2022

Mr. Ben Witkopp
Air Quality Division
Michigan EGLE
401 Ketchum Street, Suite B
Bay City, Michigan 48708

Ms. Jenine Camilleri
Air Quality Division
Michigan EGLE
P.O. Box 30260
Lansing, Michigan 48909-7760

Re: Violation Notice
SRN: N6624, Isabella County
Former Roosevelt Refinery, Mt. Pleasant, Michigan

Dear Mr. Witkopp:

This letter is in response to the Violation Notice issued to MRP Properties Company, LLC (MRP) on May 12, 2022 regarding General Permit to Install 204-05 for the above referenced site.

The Violation Notice claims that during an inspection of the site on April 13th, the required records were not submitted. MRP was not aware of your inspection. Operations at the site are automated, and the site is not regularly staffed. Weekly records are retained in an electronic database. Air samples are collected quarterly. The air quality data are entered into the database to calculate discharge rates.

You contacted MRP's environmental consultant for the site, Hamp, Mathews & Associates, Inc. (HMA) via e-mail on April 26, 2022. The e-mail requested a list of remaining equipment covered by the air permit, and to provide the data, records, and emissions for the last two years. They were unaware of any specific timeframe to provide the requested information. HMA responded to the e-mail on April 26, 2022 that they were in receipt of the request and would provide the data. HMA forwarded tables of air discharges for five years for the two operating air stacks on May 19th in an e-mail. These tables were developed from the weekly electronic database and formatted to display the data on a quarterly basis. An updated map showing the permitted discharge locations was also provided. In the interim, you attempted to contact MRP once by phone. There was no additional attempt to contact HMA. The Violation Notice was issued to MRP on May 12th.

Please note that various data for the air discharges is provided to the Michigan Department of Environment, Great Lakes, and Energy (MDEGLE) in annual progress reports submitted to your Divisional office, Mr. Larry Engelhart. This includes calculations and a chart for the 12-month rolling average discharge. A table summarizing the 12-month rolling average discharge for April 2021 through March 2022 is included in Attachment A. In addition, a chart summarizing the 12-month rolling totals for BTEX and TVOC air emissions is attached.

The Violation Notice directs MRP to address and respond to the "violations" via written response by June 2, 2022. It is MRP's position that the Notice of Violation was unwarranted. The data is collected and maintained by HMA on a regular basis and reported to the MDEGLE annually.

Respectfully,



C. Shay Wideman
Director - Environmental Liability and Remediation Management

xc: Mary Ann Dolehanty, MDEGLE
Dr. Eduardo Olague, MDEGLE
Jenine Camilleri, MDEGLE
Christopher Ethridge, MDEGLE
Chris Hare, MDEGLE

**ATTACHMENT A
SUMMARY OF AIR EMISSIONS
APRIL 2021 - MARCH 2022
FORMER ROOSEVELT REFINERY - MT. PLEASANT, MICHIGAN**

Date	TVOC Emissions (tons)			BTEX Emissions (tons)		
	Sparge Gates	Monthly Total	12-Month Rolling Total	Sparge Gates	Monthly Total	12-Month Rolling Total
Apr-21	0.00071	0.00071	0.00620	0.00001	0.00001	0.00014
May-21	0.00073	0.00073	0.00681	0.00001	0.00001	0.00014
Jun-21	0.00078	0.00078	0.00747	0.00001	0.00001	0.00015
Jul-21	0.00040	0.00040	0.00726	0.00001	0.00001	0.00016
Aug-21	0.00046	0.00046	0.00722	0.00001	0.00001	0.00017
Sep-21	0.00060	0.00060	0.00731	0.00002	0.00002	0.00019
Oct-21	0.00046	0.00046	0.00765	0.00000	0.00000	0.00016
Nov-21	0.00047	0.00047	0.00801	0.00000	0.00000	0.00016
Dec-21	0.00056	0.00056	0.00845	0.00000	0.00000	0.00016
Jan-22	0.00049	0.00049	0.00822	0.00000	0.00000	0.00015
Feb-22	0.00049	0.00049	0.00750	0.00000	0.00000	0.00012
Mar-22	0.00037	0.00037	0.00653	0.00000	0.00000	0.00008
Totals	0.00653	0.00653		0.00008	0.00008	

Air Emissions Summary 12-Month Rolling Totals



