



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

July 3, 2024

VIA EMAIL ONLY

Heather Denham
Glorious Cannabis Company
2497 East Huron Road
Au Gres, Michigan 48703

SRN: P1397, Arenac County

Dear Heather Denham:

VIOLATION NOTICE

On November 7, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), issued Permit to Install (PTI) No 128-23 to Glorious Cannabis Company located at 2497 East Huron Road, Au Gres, Michigan. The PTI encompasses a 1462 HP (1000 kilowatts (kW)) natural gas-fueled emergency engine with a model year of 2011 or later, EUENGINE1. Conditions in PTI 128-23 associated with EUENGINE1 specify testing/sampling requirements. Glorious Cannabis Company conducted emission sampling of EUENGINE1 on May 14, 2024. A copy of the complete test report was received by the AQD on June 24, 2024.

Based on the date testing was completed and the sampling results provided, the AQD alleges Glorious Cannabis Company is in violation of the following:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1	PTI 128-23 Special Condition (SC) I.1. and 40 CFR 60.4233(e), Table 1 to 40 CFR Part 60, Subpart JJJJ	EUENGINE1 has a NOx emission limit of 2.0 g/HP-hr. Sample results provided demonstrated an average emission rate of 2.40 g/HP-hr.
EUENGINE1	PTI 128-23 SC V.1. and 40 CFR 60.4244a	EUENGINE1 was not operated within 10 percent of 100 percent peak load during the duration of test runs.
EUENGINE1	PTI 128-23 SC V.2.	Testing to verify the NOx, CO, and VOC emission rates was not completed within 180 days of permit issuance.

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Special Condition I.1. of PTI 128-23 establishes a NOx emission limit of 2.0 g/HP-hr for EUENGINE1. The underlying applicable requirements for this emission limit are 40 CFR 60.4233(e), Table 1 to 40 CFR Part 60, Subpart JJJJ. Emission results demonstrated the actual average emission rate of NOx measured during testing was 2.40 g/HP-hr. This is an exceedance of the NOx emission limit.

Special Condition V.1 of PTI 128-23 states that performance tests shall be conducted according to 40 CFR 60.4244. 40 CFR 60.4244a, Subpart JJJJ states each performance test must be conducted within 10 percent of 100 percent peak (or the highest achievable) load. Additionally, the requirement that each performance test must be conducted within 10 percent of 100 percent peak (or highest achievable) load was listed under the load requirements section of the Approval of Protocol for Emissions Testing Letter provided by the AQD. Data provided in the test report submitted demonstrates the percent load at which EUENGINE1 was operated during testing ranged from 74.48% to 98.21%. EUENGINE1 was not operated within 10 percent of 100 percent peak load during the duration of testing. The data provided demonstrates operating within 10 percent of 100 percent peak load is achievable.

Special Condition V.2. stipulates within 180 days of permit issuance of EUENGINE1, the permittee shall verify NOx, CO, and VOC emission rates from EUENGINE1 by testing at owner's expense. PTI 128-23 was issued on November 7, 2023. 180 days from permit issuance was May 5, 2024. Testing to verify the emission rates was not completed until May 14, 2023, and was therefore not completed within 180 days of permit issuance.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 24 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 Nathanel Gentle at EGLE, AQD, Bay City District, at 401 Ketchum St Suite B, Bay City, Michigan 48708 or GentleN@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Glorious Cannabis Company 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.

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Thank you for your attention to resolving the violations cited above. 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,

A handwritten signature in black ink that reads "Nathanael Gentle". The signature is written in a cursive, flowing style.

Nathanael Gentle
Environmental Quality Analyst
Air Quality Division
989-778-0025

cc: Cannabis Regulatory Agency
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Gina McCann, EGLE
Amy Beaver, EGLE