



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

September 17, 2024

Julie Johnston, Vice President  
Hound Resources LLC  
104 South Main Street, Suite 201  
Romeo, Michigan 48065

SRN: B5588, Wexford County

Dear Julie Johnston:

**VIOLATION NOTICE**

On July 24, 2024 and on August 1, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Hound Resources - Wexford 10 Facility located at 7 Mile Road between West 4 Road and West 6 Road, Buckley, Michigan. The purpose of this inspection was to determine Hound Resources - Wexford 10 Facility 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 140-22;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUDEHY	PTI 140-22; Testing / Sampling, V.1	Wet Gas Analysis was not provided for the Calendar Year.
EUDEHY	PTI 140-22; Process / Operation Restrictions, III.1	Hound Resources reported a 0.41 GPM recirculation rate, when the glycol recirculation rate for EUDEHY shall not exceed a maximum of 0.13 GPM.

The records provided demonstrate that actual recirculation rate of Glycol from the EUDEHY process equipment are 0.41 GPM. The conditions of PTI number 140-22 limit the recirculation rate of Glycol to 0.13 GPM.

During this inspection, Hound Resources LLC was unable to produce emission records for the annual wet gas analysis. This is a violation of (the recordkeeping and emission limitations) specified in Special Condition Testing and Sampling V.1. of PTI number 140-22. The conditions of PTI number 140-22 require at least once each calendar year, the permittee shall obtain, by sampling, an analysis of the wet gas stream. The

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permittee shall analyze the sample for nitrogen, carbon dioxide, hydrogen sulfide, C1 through C6 series hydrocarbons, benzene, toluene, xylene, ethylbenzene, and heptanes plus. The permittee must submit any request for a change in the sampling frequency to the AQD District Supervisor for review and approval.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 8, 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 Tammie Puite, Environmental Quality Analyst at EGLE, AQD, Cadillac District, at 120 West Chapin Street, Cadillac, Michigan 49601 or PuiteT@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Hound Resources LLC 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. 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,



Tammie Puite  
Environmental Quality Analyst  
Air Quality Division  
231-780-7031 / PuiteT@Michigan.gov

cc: Jon Ptashnik, Hound Resources LLC  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Shane Nixon, EGLE  
Jodi Lindgren, EGLE