



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

October 15, 2015

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Raj Minhas
President and Chief Operating Officer
Lockhart Chemical Company
4302 James P. Cole Boulevard
Flint, MI 48505

SRN: B6179, Genesee County

Dear Mr. Minhas:

VIOLATION NOTICE

On September 1, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection at Lockhart Chemical Company located at 4302 James P. Cole Boulevard, Flint. The purpose of this inspection was to determine your facility'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); Title 40 Code of Federal Regulations Part 60 (40CFR60), Subparts Dc, III, and Kb; and the administrative rules and the conditions of Permits to Install (PTI) numbers 120-00, 311-98, 366-94, 714-92, 110-91, 433-89, 432-89, 432-88, 254-83, 855-80A, 855-80, and 349-77.

From inspection observations and records obtained during the inspection, staff noted the following violations:

Process Description	Violation Number	Rule/Permit Condition Violated	Comments
EU-CALCIUM	1	Special Condition 13. of PTI 855-80A	Scrubber not used for process
EUMYERS	2	Special Condition 12. of PTI 432-88	Holes in PM control (baghouse)

Violation Descriptions as numbered in the above table:

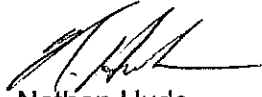
1. According to the permit application dated March 10, 1983, this process is controlled by a wet scrubber. The wet scrubber is required to be used for the process as per Special Condition 13. "Applicant shall not operate the calcium sulfonate process unless the wet scrubber is installed and operating properly". Lack of use of the scrubber constitutes a violation to this condition. During the inspection, it was stated by the company that the process had changed and no longer required the scrubber. Should this be the case, either a permit change is required or the scrubber must be functioning when the process is operating.
2. The baghouse observed was in poor condition with holes in the funnel used to collect air contaminants and holes in the apparatus (barrel) used to collect the contaminants. The holes allow collected contaminants to disperse into the ambient air and thus constitutes a violation of Special Condition 12. "Applicant shall not operate the mixer unless the bag filter collector is installed and operating properly".

In reference to the violations identified in this letter, please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 12, 2015. 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.

If Lockhart Chemical 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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of your facility. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below or at huden@michigan.gov.

Sincerely,



Nathan Hude
Environmental Quality Analyst
Air Quality Division
517-284-6779

NH:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ