



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

November 5, 2018

Mr. Ron Sturdivant, Production Manager  
Atmosphere Annealing, LLC  
1801 Bassett Street  
Lansing, Michigan 48915

SRN: N0478, Ingham County

Dear Mr. Sturdivant:

**VIOLATION NOTICE**

On October 19, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Atmosphere Annealing located at 1801 Bassett Street, Lansing, Michigan. The purpose of this inspection was to determine Atmosphere Annealing'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 Permits to Install (PTI) Numbers 1270-91, 473-97A, and 88-16.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU_AMMONIA_01	PTI 88-16, Special Condition III.2; R 336.1901 (Rule 901)	Atmosphere Annealing does not have an emergency response plan for the anhydrous ammonia tank.
EU_AMMONIA_01	PTI 88-16, Special Condition III.2; R 336.1901 (Rule 901)	The emergency response plan for the anhydrous ammonia tank has not been reviewed and approved by local emergency planning committee
EU_AMMONIA_01	PTI 88-16, Special Condition VI.1; R 336.1225 (Rule 225); R 336.1901 (Rule 901)	Records of the date of annual review and approval of the emergency response plan by the local emergency planning committee have not been kept.

During this inspection, Atmosphere Annealing was unable to produce an emergency response plan for the anhydrous ammonia tank, EU\_AMMONIA\_01, which is required to be reviewed by

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the local fire department or local emergency response agency annually, every spring, and updated when necessary. Because there is no plan, the annual review could not be conducted.

Collectively, these are a violation of the Process/Operational Restrictions specified in Special Condition III.2 of PTI Number 88-16.

Additionally, because Atmosphere Annealing was unable to produce an emergency response plan, they were also not able to provide records of the date of annual review and approval of the emergency response plan with the local fire department or local emergency response agency.

This is a violation of Monitoring/Recordkeeping Special Condition VI.1 of PTI Number 88-16, which requires records of annual review and approval of the emergency response plan.

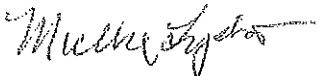
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 26, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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 the DEQ, AQD, (to my attention) Lansing District Office, at Constitution Hall, First Floor South, Lansing District Office, 525 W. Allegan, P.O. Box 30242, Lansing, Michigan 48909 and also submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Atmosphere Annealing 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 Atmosphere Annealing. 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  
517-284-6636

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Mr. Brad Myott, DEQ