



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

January 29, 2020

Mr. Tim Van Hoven
Atlas EPS
8240 Byron Center Avenue SW
Byron Center, Michigan 49315

SRN: N1794, Kent County

Dear Mr. Van Hoven:

VIOLATION NOTICE

On December 17, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Atlas EPS located at 8240 Byron Center Avenue SW, Byron Center, Michigan. The purpose of this inspection was to determine Atlas EPS'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; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N1794-2017a and to investigate recent complaints we received which are attributed to Atlas EPS's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGEPS	ROP No. MI-ROP-N1794-2017a, FGEPS, Special Condition (SC) II.3	Failure to properly calculate materials and emissions pursuant to the equation.
FGEPS	ROP No. MI-ROP-N1794-2017a, FGEPS, SC V.5 and V.7	Failure to determine VOC content of product as shipped on an annual basis for the past three years.
FGEPS	ROP No. MI-ROP-N1794-2017a, FGEPS, SC V.6 and V.7	Failure to determine VOC content of regrind / densified scrap on an annual basis for the past three years.
FGEPS	ROP No. MI-ROP-N1794-2017a, FGEPS, SC VI.8	Failure to conduct recordkeeping as required in Appendix 3.

Process Description	Rule/Permit Condition Violated	Comments
FGEPS	ROP No. MI-ROP-N1794-2017a, General Condition 10; Rule 910	Failure to properly operate thermal oxidizer.
FGEPS	ROP No. MI-ROP-N1794-2017a, FGEPS, SC IV.2	Failure to operate thermal oxidizer above the minimum required temperature.

During the recordkeeping review, the AQD learned that Atlas EPS has not conducted sampling to determine the VOC content of product as shipped on an annual basis and has not been calculating the actual VOC retention value based on a production weighted average. Annual testing was required as part of the 2017 permit renewal process. Additionally, Atlas EPS did not request and receive approval for any sampling and analysis methods for either the product as shipped nor the regrind, or densified scrap, from the AQD District Supervisor. This is a violation of the recordkeeping and sampling requirements of the permit.

It is noted that without accurate VOC content values for the product as shipped, the reported emissions are also incorrect. This is a violation of the recordkeeping requirements as detailed in FGEPS, SC II.3 and VI.8 of the permit.

Finally, a review of temperature data along with the past two thermal oxidizer annual inspection reports indicates that the poppet valve section had deteriorated, and the ceramic media was 9" low. These deficiencies impact temperature regulation and are believed to have caused the many instances of recorded temperatures below the minimum required temperature of 1,340°F.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 19, 2020 (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.

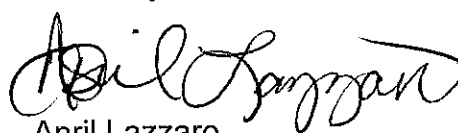
Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NE, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Mr. Tim Van Hoeven
Atlas EPS
Page 3
January 29, 2020

If Atlas EPS 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 Atlas EPS. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE