



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 8, 2014

Mr. Joe Kammer, Plant Foreman
Wilkie Brothers Conveyors, Inc.
1765 Michigan Avenue
Marysville, Michigan 48040

SRN: N3337, St. Clair County

Dear Mr. Kammer:

VIOLATION NOTICE

On July 23, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Wilkie Brothers Conveyors, Inc. located at 1765 Michigan Avenue, Marysville, Michigan. The purpose of this inspection was to determine Wilkie Brothers Conveyors, Inc.'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 administrative rules and the conditions of Permit to Install (PTI) number 1326-91.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
4 Burn-Ovens	R336.1201	Facility installed 4 burn-off ovens without obtaining permit to install.
Burn-off Oven (Model No.6606)	R336.1910, PTI No. 1326-91 SC No. 15	Proper operation of the afterburner for the burn-off oven could not be verified. The afterburner temperature read out did not display temperature reading.

During this inspection, it was noted that Wilkie Brothers Conveyors, Inc. had installed and commenced operation of four unpermitted burn-off ovens at this facility. The AQD staff advised Wilkie Brothers Conveyors, Inc. on July 23, 2014, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the four burn-off ovens. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

On July 23, 2014, the AQD staff also observed operation of burn-off oven (Model No. 6606) while the temperature display of the burn-off oven afterburner was malfunctioning. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 29, 2014. 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 Wilkie Brothers Conveyors, Inc. 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 July 23, 2014. 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,



Sebastian G. Kallumkal
Senior Environmental Engineer
Air Quality Division
(586) 753-3738

SK/DC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ