



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

April 29, 2021

Mr. Scott Mendelson, EHS Director
Quaker Houghton
One Quaker Park
901 E. Hector Street
Conshohocken, PA 19428

SRN: A7513, Wayne County

Dear Mr. Mendelson:

VIOLATION NOTICE

On April 19, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor investigation in the vicinity of Quaker Houghton located at 9100 Freeland Street, Detroit, Michigan. The purpose of this investigation was to determine Quaker Houghton's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Michigan Air Pollution Control Rules; and to investigate a complaint of nuisance odors received on April 19, 2021.

AQD staff performed an odor investigation from approximately 1:10 PM until 3:43 PM on April 19, 2021. During this time, AQD staff observed the following violation:

Process Description	Rule/Permit Condition Violated	Comments
Oil and additive blending operations	R 336.1901(b)	Objectionable chemical odors in nearby neighborhoods, attributable to the facility, of sufficient intensity, duration, and frequency as to constitute unreasonable interference with the comfortable enjoyment of life and property.

R 336.1901(b) states, in part:

“A person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause ... unreasonable interference with the comfortable enjoyment of life and property.”

During the investigation on April 19, 2021, AQD staff observed objectionable chemical odors in a residential area a quarter mile to a half mile downwind of the company. AQD staff did not observe the chemical odor when positioned upwind of the company. Based

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on the wind direction and distinct odor, odors were determined to be attributable to the facility's operations. In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of R 336.1901(b) of the administrative rules promulgated under Act 451.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 20, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Quaker Houghton 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact either Nazaret Sandoval at 313-418-5446 or me at the number listed below.

Sincerely,



Sam Liveson
Environmental Engineer
Air Quality Division
313-405-1357

cc: Mr. John Bozick, Quaker Houghton
Mr. Michael Francis, Quaker Houghton
Mr. Hosam Hassanian, City of Detroit BSEED
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olague, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Dr. April Wendling, EGLE
Mr. Jeff Korniski, EGLE
Ms. Nazaret Sandoval, EGLE