



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

October 14, 2021

Mr. James Martin
Guardian Industries
14600 Romine Road
Carleton, Michigan 48117

SRN: B1877, Monroe County

Dear Mr. Martin:

VIOLATION NOTICE

On October 12, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a final emission test report from Guardian Industries located at 14600 Romine Rd., Carleton, Michigan. The purpose of this report was to demonstrate Guardian Industries 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-B1877-2021b; and Consent Decree, "U.S. et al. v Guardian Industries, Civil Action 15-13426, E.D. MICH., 2015".

During the review of the emission report, staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EU00079 - Line 1	"U.S. et al. v Guardian Industries, Civil Action 15-13426, E.D. MICH., 2015" paragraph 22, Act 451, Section 324.5503(b), R 336.1225 / SC I.9	The stack test report showed that the average emission of H ₂ SO ₄ was approximately 2.25 lbs/hr (reported as <2.25 lbs/hr) which is greater than their permitted limit of 1.6 lbs/hr.

On July 13, 2021, Guardian Industries conducted a stack test to determine compliance with the emission limits for filterable PM and H₂SO₄. Guardian Industries submitted the final version of the stack test report on October 12, 2021, which showed the H₂SO₄ emissions greater than their permitted limit. The conditions of ROP number MI-ROP-B1877-2021b, limit the emissions of H₂SO₄ to 1.6 lbs/hr per SC I.9.

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The cited (Special Condition SC I.9 of ROP number MI-ROP-B1877-2021b) is (also) enforceable as paragraph 22 of Consent Decree, "U.S. et al. v Guardian Industries, Civil Action 15-13426, E.D. MICH., 2015".

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 4, 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, Jackson District, at 301 East Louis Glick Highway, Jackson, Michigan 49201, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Guardian Industries 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 and for the cooperation that was extended to me during my inspection of June 22, 2021, and during the observation of the H₂SO₄ retest on October 5, 2021. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Brian Carley
Environmental Quality Specialist
Air Quality Division
517-416-4631

cc:

Mr. Benjamin Kroeger, Guardian Industries
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Scott Miller, EGLE