



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 22, 2020

Mr. Terry Rosenfeldt
Terminal Operations Manager
US Energy Distribution, LLC
40600 Grand River Avenue
Novi, MI 48375-2810

SRN: B2881, Oakland County

Dear Mr. Rosenfeldt:

VIOLATION NOTICE

On September 10, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of US Energy Distribution, LLC located at 40600 Grand River Avenue, Novi, Michigan. The purpose of this inspection was to determine US Energy Distribution, LLC'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 Permit to Install (PTI) number 1140-92D.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EULOADRACK	R 336.1910	The permittee failed to maintain the vapor destruction unit Magnehelic pressure differential gauge, which is a component of the air cleaning device.
EULOADRACK	PTI No. 1140-92D, Special Condition III.4	The permittee failed to submit a Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) to the AQD District Supervisor no later than 60 days after issuance of the permit. The permit was issued on September 6, 2019. The PM/MAP was due on November 5, 2019.

EULOADRACK	PTI No. 1140-92D, Special Conditions VI.1, and 2.	The permittee failed to complete all required calculations by the 15th day of the calendar month, for the previous calendar month; and the permittee failed to calculate the VOC emission rate on a monthly basis.
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On September 10, 2020, the AQD staff observed that the permittee failed to maintain the vapor destruction unit Magnehelic pressure differential gauge, which is a component of the air cleaning device that controls emissions from EULOADRACK. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, 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.

Per the inspection conducted on September 10, 2020, and subsequent communications, the AQD staff determined that the permittee failed to submit a Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) to the AQD District Supervisor no later than 60 days after issuance of the permit. The permit was issued on September 6, 2019. The PM/MAP was due on November 5, 2019. This constitutes a violation of PTI No. 1140-92D, Special Condition III.4.

Per the inspection conducted on September 10, 2020, and subsequent communications, the AQD staff determined that the permittee failed to complete all required calculations by the 15th day of the calendar month, for the previous calendar month as required per EULOADRACK VI.1; and the permittee failed to calculate the VOC emission rate on a monthly basis month as required per EULOADRACK VI.2. This constitutes a violation of PTI No. 1140-92D, Special Conditions VI.1, and 2.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 13, 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, Warren District, at 27700 Donald Court, Warren, Michigan 48092-2793, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If US Energy Distribution, LLC 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 September 10, 2020. 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,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

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