



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 27, 2022

VIA E-MAIL

Raj Minhas, President & Chief Operating Officer
Lockhart Chemical Company
4302 James P. Cole Boulevard
Flint, Michigan 48505

SRN: B6179, Genesee County

Dear Raj Minhas:

VIOLATION NOTICE

On April 13, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), along with the United States Environmental protection Agency (EPA) conducted an inspection of Lockhart Chemical Company (Lockhart Chemical), located at 4302 James P. Cole Boulevard, Flint, Michigan. Additionally, AQD staff returned to the site on May 5, 2022, to continue the inspection. The purpose of these inspections was to determine Lockhart Chemical'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 26-16.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUREACTOR304	PTI 26-16, EUReactor304, Special Condition (SC) IV.2, Rule 910	A temperature gauge for Reactor 304's condensate tank was not in place, during the inspection.
EUCALCIUM	PTI 26-16, EUCALCIUM, Special Condition (SC) IV.1, Rule 910	The bag filter for the bin vent filter was not maintained in a satisfactory manner, per the inoperable pressure drop gauge.
EUCALCIUM	PTI 26-16, EUCALCIUM, SC IV.2, Rule 910	The pressure drop indicator was not being maintained.
EUOxidation216	PTI 26-16, EUOxidation216, SC IV.1, Rule 910	The thermal oxidizer temperature was not being maintained above 1400 degrees F at all times.
EUOxidation216	PTI 26-16, EUOxidation216, SC IV.3, Rule 910	Failure to satisfactorily maintain and operate a

		device to monitor and record the vent stream flow from the reactor to the thermal oxidizer.
EUOxidation216	PTI 26-16, EUOxidation216, SC VI. 3, Rule 910	Failure to monitor and record, in a satisfactory manner, the vent stream flow from the reactor to the thermal oxidizer or afterburner on an hourly basis.
FGLime540-541	PTI 26-16, FGLime540-541, SC III.1	The lime storage silo's preventative maintenance program was not being maintained.
FGLime540-541	PTI 26-16, FGLime540-541, SC IV.1, Rule 910	The bin vent filter was not maintained in a satisfactory manner.
FGFACILITY	PTI 26-16, FGFACILITY, SC IV.1	Some identifying labels on equipment were deteriorated enough to be illegible or were missing.

PTI 26-16 EUReactor304 SC IV. 2. requires the permittee to equip and maintain the condenser with a received condensate temperature indicator in the condensate collection tank. However, during the April 13, 2022 inspection, a temperature indicator for the condenser could not be found. In your June 17, 2022 email to the AQD, it was explained that the temperature gauge was broken, and had been removed at some point between March 31 and April 13, 2022, with no production taking place during that time. The absence of the temperature indicator on April 13, 2022, constitutes a violation of the requirement.

During the inspection, the bag filter for EUCALCIUM, a process to produce natural calcium sulfonate was observed to have an inoperable pressure drop gauge. This violates PTI 26-16, EUCALCIUM, SC IV.1, because the bag filter was not maintained in a satisfactory manner, per the inoperable pressure drop gauge.

PTI 26-16, EUCALCIUM, SC IV.2 requires the permittee to equip and maintain the bag filter with a pressure drop indicator. Because the pressure drop gauge was inoperable, this condition was not being met.

Rule 910 of the administrative rules promulgated under Act 451 requires an air-cleaning device to be installed, maintained, and operated in a satisfactory manner. EPA and AQD staff observed several air pollution control equipment deficiencies (listed above) which constituted violations of Rule 910.

During the inspection, EPA and AQD staff observed EUOxidation216 in operation. The thermal oxidizer temperature fluctuated during operation, as displayed digitally and on a

circular paper temperature chart. EPA staff photographed an instance where the temperature dropped to 1390 degrees F. This is a violation of PTI 26-16, SC IV.1, which requires the vent gases from the reactor to be burned in a thermal oxidizer and the thermal oxidizer to be installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer includes maintaining a minimum temperature of 1400 degrees F. If temperature fluctuations are part of normal operation, the overall temperature setpoint of the device should be elevated, to prevent any temperature decreases from dropping below 1400 degrees F.

EPA and AQD staff were informed that the hardcopy recording feature of the vent stream flow monitor for EUOxidation216 had not been working for the past 2 years. This is a violation of PTI 26-16, EUOxidation216, SC IV.3 and VI.3, failing to satisfactorily maintain and operate a device to monitor and record the vent stream flow from the reactor to the thermal oxidizer.

EPA's Valeria Apolinario and AQD staff climbed to a platform atop a lime storage silo, EULimeTank540, to observe the bin vent filter. AQD had inquired as to the last time maintenance had been done on the bin vent filter, and I was told it had been two years. Upon raising the lid of the bin vent filter cabinet, the cabinet was seen to be almost completely filled with lime, and no bag filter was visible. This is a violation of PTI 26-16, FGLime540-541, SC III.1, because the lime storage silo's preventative maintenance program was not being maintained.

The above issue also violates PTI 26-16, FGLime540-541, SC IV.1, which requires the lime storage tank not to be operated unless the bin vent filter is installed, maintained, and operated in a satisfactory manner. The buildup of lime inside the bag filter cabinet demonstrates that the tank has been operated in the past, without the bin vent filter being maintained and operated in a satisfactory manner.

Rule 910 of the administrative rules promulgated under Act 451 requires an air-cleaning device to be installed, maintained, and operated in a satisfactory manner. EPA and AQD staff observed several air pollution control equipment deficiencies (listed above) which constituted violations of Rule 910.

Additionally, the AQD has received, on May 13, 2022, a record of maintenance on April 25, 2022, under the lime storage silo preventative maintenance program. This record is required to be kept by PTI 26-16, FGLime540-541, SC VI.4. Please provide preventative maintenance records for the past 5 years for the lime storage silo.

Lastly, identification labels on some process or process equipment appeared to be missing, or deteriorated, as in the case of the EUREACTOR 304 condenser, whose sign had weathered to the point where it only read, "Condenser Pot" instead of what was believed to have once read "304 Condenser Pot." This violates PTI 26-16, FGFACILITY, SC IV.1.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 19, 2022, (which coincides with 21 calendar days

Raj Minhas
Lockhart Chemical Company
Page 4
June 27, 2022

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, Lansing District, at Constitution Hall, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lockhart Chemical 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 us during my inspection of Lockhart Chemical. 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,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

cc: Valeria Apolinario, EPA
Brittany Cobb, EPA
David Sutlin, EPA
Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Hugh McDiarmid, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE