



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER
DIRECTOR

November 29, 2016

Ms. Annette Collier
American Colloid Company
807 Austin Avenue
Albion, Michigan 49224

SRN: B7010, Calhoun County

Dear Ms. Collier:

VIOLATION NOTICE

On November 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of American Colloid Company (Facility), located at 807 Austin Avenue, Albion, Michigan. The purpose of this inspection was to determine the Facility'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) No. 326-88 and 327-88, and the associated Malfunction Abatement Plan (MAP) and Fugitive Dust Control Plan (FDCP).

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Truck Loadout	PTI No. 326-88, Special Condition (SC) #22	Staff observed that several of the loadout vacuum lines had missing, cracked, or torn flexible tubing that results in insufficient draw and capture of dust emissions generated during truck loadout.
Kice Collector	PTI No. 326-88, SC #18	Per enclosed Facility letter dated October 14, 1998, the Facility relocated or agreed to relocate baghouse differential pressure gauges to ground level by November 30, 1998. This work was never completed per discussion with plant employee during this inspection.
Fugitive Dust Control Plan	PTI No. 326-88, SC #20; PTI No. 327-88, SC #25	The FDCP, Attachment A, states that the Facility will record pressure differential on a monthly basis for all baghouses; check for visible emissions and clogged lines; and maintain an updated spare parts inventory. The

		Facility has a monthly particulate matter (PM) sheet for certain dust collectors; however, it lacks the level of work detail required by the FDCP. Additionally, Section 6 of the FDCP states that the roadway will be swept and vacuumed on a daily basis by a sweeper owned and operated by the foundry (Harvard Industries). Harvard Industries permanently shut down in June 2002 and the Facility has not continued daily sweeping. Staff observed dust drag out on the plant roadway during the inspection and the 54" Facility owned sweeper is considered to be undersized to clean the 500' x 24' width access road. The Facility should prepare and submit a revised FDCP.
Mikropul Baghouse Collectors	PTI No. 327-88, SC #20	See the second comment above.
Mikropul 16-N-6 Collector	PTI No. 327-88, SC #21	Tanker truck was unloading powdered coal to Tanks 2-A and 3-B during the inspection, and staff observed dust emissions from the baghouse collector vent that demonstrates control equipment was not operating properly. Staff also observed fugitive dust emissions from the middle truck loadout bay, but was unable to determine the source of these emissions.

On November 9, 2016, the AQD staff observed dust emissions from the dust collector exhaust serving Tanks 2-A and 3-B. Staff also observed intermittent fugitive dust emissions from the middle truck loadout bay, but was unable to determine the source of these emissions. Therefore, the Facility shall contract with a vendor to evaluate all on-site dust collectors and bin vents, and initiate any corrective measures that are necessary to return the control equipment to manufacturer's specifications and to proper operation. The Facility's response should include a timeline to enter into a vendor contract, to complete an assessment of all dust collection control equipment, and to initiate any required maintenance and/or corrective repairs.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 20, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the

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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; what steps are being taken to prevent a reoccurrence; and shall also include a dust collector vendor contract timeline as noted in the above paragraph.

If the Facility 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 the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Rex I. Lane
Senior Environmental Quality Analyst
Air Quality Division
269-567-3547

RIL:CF

Enclosures

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ