

## STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY DETROIT FIELD OFFICE



DAN WYANT DIRECTOR

April 14, 2014

Ms. Melinda Keillor, EHS Manager EQ Detroit 1923 Frederick St. Detroit, MI 48211

Dear Ms. Keillor:

SRN: M4545, Wayne County

## **VIOLATION NOTICE**

On April 11, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of EQ Detroit located at 1923 Frederick St., Detroit, Michigan. The purpose of this inspection was to determine EQ Detroit'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 administrative rules, the conditions of Permit to Install (PTI) number 269-04D, and to investigate a recent complaint which we received on April 11, 2014, regarding fugitive dust/smoke attributed to EQ Detroit's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Chem-Fix	PTI No. 269-04D; EUTREATMENT, SC III.3	Failure to maintain negative pressure in Chem-Fix building, allowing particulate emissions to escape building.
Chem-Fix	Act 451, Rule 301	Particulate emissions greater than 20%; highest 6-minute opacity was 63%.

During this inspection it was noted that EQ Detroit Chem-Fix process was emitting opacity in excess of emissions allowed by Act 451, Rule 301.

Enclosed are copies of the instantaneous and six-minute average readings taken at EQ Detroit.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 5, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date 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.

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If EQ Detroit 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 EQ Detroit. 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,

Jonathan Lamb

Senior Environmental Quality Analyst

Air Quality Division

313-456-4683

Enclosure

cc via email: Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ