



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

November 07, 2024

Christina Beydoun
Piranha Hose Products, Inc
2500 Weigel Street
Cadillac, MI 49601

SRN: N7275, Wexford County

Dear Christina Beydoun:

VIOLATION NOTICE

On September 4, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Piranha Hose Products, Inc., located at 2500 Weigel Street, Cadillac, Michigan. The purpose of this inspection was to determine Piranha Hose Products 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 186-03;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-ADHESIVES	PTI 186-03, Conditions 1.7 and 1.8	Facility unable to provide usage records and emissions calculations on monthly basis for a 5-year retention period
Equipment that utilizes adhesives and is not listed in PTI 186-03	R 336.1201(1)	Additional braiders and extruders were installed and are being operated without first obtaining a Permit to Install

During this inspection, Piranha Hose Products was unable to produce material usage and emission calculation records for the equipment listed in PTI number 186-03.

This is a violation of (the recordkeeping and emission limitations) specified in Condition 1.7 of PTI number 186-03.

The conditions of PTI number 186-03 require monthly material usage and emissions calculations (e.g., maintenance of records, which shall be made available for review upon request by the AQD staff).

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During this inspection, it was noted that Piranha Hose Products had commenced operation of unpermitted equipment at this facility. This is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the unpermitted process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 2, 2024 (which coincides with 25 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 Lindsey Wells at EGLE, AQD, Cadillac District, at 120 W Chapin Street, Cadillac, Michigan 49601 or WellsL8@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Piranha Hose Products 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 Piranha Hose Products. 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,



Lindsey Wells
Senior Environmental Quality Analyst
Air Quality Division
517-282-2345

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Shane Nixon, EGLE