

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

Detroit



C. HEIDI GRETHER DIRECTOR

December 14, 2018

Mr. Greg Reichard Chief Executive Officer Aevitas Specialty Services Corporation 663 Lycaste Detroit, Michigan 48214

SRN: N7359, Wayne County

Dear Mr. Reichard:

## VIOLATION NOTICE

On December 10, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) investigated a complaint regarding nuisance odors alleged to be the result of operations at Aevitas Specialty Services (hereinafter "Aevitas"), located at 663 Lycaste in Detroit. The purpose of this investigation was to determine the compliance of the Aevitas facility 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); and the Air Pollution Control Rules.

I performed an investigation of the odor complaint from approximately 4:05 PM to 4:55 PM on December 10, 2018. During the investigation, the following air pollution violation was observed:

| Process Description                            | Rule/Permit<br>Condition Violated                      | Comments  |
|--|--|---|
| Liquid industrial waste processing operations. | Michigan Administrative Rule<br>901(b) (R 336.1901(b)) | Persistent objectionable<br>odors of a moderately strong<br>intensity (Level 3) were<br>detected downwind of the<br>Aevitas facility. |

During my investigation on December 10, I detected persistent odors in areas downwind of the Aevitas facility. I detected the odors along Terminal Street south of East Jefferson Avenue, and in the area around Terminal Court. These odors were determined to be attributable to the Aevitas facility. Odors were not observed upwind of the facility.

R 336.1901(b) states, in part:

"A person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reactions with other air contaminants, unreasonable interference with the comfortable enjoyment of life and property."

Mr. Greg Reichard Page 2 December 14, 2018

In AQD staff's professional judgment, the odors that were observed during the complaint investigation were of sufficient intensity and duration to constitute a violation of R 336.1901(b).

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 4, 2019. The written response should include: the dates that 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.

Please submit the written response to the DEQ, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Aevitas believes that the above observations or statements are inaccurate or do not constitute a violation 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. 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,

Atestro Werk

Stephen Weis Senior Environmental Engineer Air Quality Division 313-456-4688

cc: Mr. Paul Max, City of Detroit BSEED Ms. Mary Ann Dolehanty, DEQ Dr. Eduardo Olaguer, DEQ Mr. Christopher Ethridge, DEQ Ms. Jenine Camilleri, DEQ Ms. Wilhemina McLemore, DEQ Mr. Jeff Korniski, DEQ