



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

August 13, 2020

VIA E-MAIL AND U.S. MAIL

Mr. Gene Brow  
Gene Brow and Sons  
1910 Ashmun Street  
Sault Ste Marie, Michigan 49783

SRN: N7918, Chippewa County

Dear Mr. Brow:

**VIOLATION NOTICE**

On August 6, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Gene Brow and Sons located at 3866 S Mackinaw Trail, Sault Ste Marie, Michigan. The purpose of this inspection was to determine Gene Brow and Sons 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 369-07;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Compliance with 40 CFR Part 60 Subpart OOO	Special Condition 1.6 and 1.9	Source has not conducted initial visible emission performance testing on applicable portions of EU-Process.
Control device	Special Condition 1.7	Spray bars were not installed on all required equipment listed in Appendix A.
Labels on equipment	Special Condition 1.8	ID numbers were not observed on equipment listed in Appendix A.

This process is also subject to the federal New Source Performance Standards (NSPS) for Nonmetallic Mineral Processing Plants. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart OOO.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 2, 2020 (which coincides with 21 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 EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Gene Brow and Sons 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 Gene Brow and Sons. 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,



Michael Conklin  
Environmental Engineer  
Air Quality Division  
906-202-0013

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Ed Lancaster, EGLE