

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY DETROIT



October 29, 2015

Mr. Jeffrey Truitt K+S Services, Inc. 15677 Noecker Way Southgate, MI 48195

SRN: N8300, Wayne County

Dear Mr. Truitt:

VIOLATION NOTICE

On July 28, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of K+S Services, Inc. located at 20401 Gladwin Avenue, Taylor, Michigan. The purpose of this inspection was to determine K+S Services, Inc. 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, and the conditions of Permit to Install (PTI) No 195-09.

During the inspection, staff observed the following:

	Rule/Permit	
Process Description	Condition Violated	Comments
EUBURNOFF	PTI 195-09, S.C.1.10	Calibration records demonstrating that the thermocouples for the primary chamber and afterburner have been calibrated on a yearly basis were requested during the on site inspection. Additional requests were emailed on July 30, August 14, and September 21, 2015. No records have been received.
EUBURNOFF	PTI 195-09, S.C. 1.11	Temperature records for the afterburner were requested during the onsite inspection. Additional requests were emailed on July 30, August 14, and September 21, 2015. No records have been received.
EUBURNOFF	PTI 195-09, S.C. 1.12	Records of any maintenance or malfunctions of the oven were requested during the on site inspection. Additional requests were emailed on July 30, August 14, and September 21, 2015. No records have been received.

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EUBURNOFF	PTI 195-09, S.C. 1.14	interlock system that is activated when the afterburner is not operating properly was requested during the onsite inspection. Additional requests were emailed on July 30, August 14, and September 21, 2015. No records
		have been received.

During this inspection and after several subsequent records requests, K+S was unable to produce the required records. This is a violation of the recordkeeping specified in Recordkeeping/Reporting/Notification section of PTI number 195-09.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 19, 2015 (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.

If K+S Services 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. 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,

Katie Koster

Senior Environmental Engineer

Air Quality Division

313-456-4678

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

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

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski DEQ