



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

June 2, 2017

Mr. John Stuart
Cargill Salt
916 S. Riverside Avenue
Saint Clair, MI 48079-5335

SRN: A6240, Saint Clair County

Dear Mr. Stuart:

VIOLATION NOTICE

On April 12, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Cargill Salt located at 916 South Riverside Avenue, Saint Clair, Michigan. The purpose of this inspection was to determine Cargill Salt'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 167-14A.

During the inspection, an emissions test was conducted. Per the emissions test report, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGOOO	PTI 167-14A, Special Condition I.1, and 40 CFR 60.672(a)	The average PM stack emissions are 0.123 g/dscm, which is an exceedance of the 40 CFR Part 60, Subpart OOO, Table 2 emission limit of 0.05 g/dscm.
FGOOO	R 336.1910	The permittee failed to maintain and operate the air-cleaning device in a satisfactory manner.

The emission test report received by the AQD on May 22, 2017, appears to demonstrate that actual emissions of PM from the FGOOO nonmetallic mineral crushing process equipment is 0.123 g/dscm, which is an exceedance of the 40 CFR 60.672(a) Table 2 emission limit of 0.05 g/dscm, and the PTI number 167-14A, Special Condition I.1 emission limit of PM to 0.05 g/dscm.

Mr. John Stuart
Page 2
June 2, 2017

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 23, 2017. The written response should include: the dates 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 note that an additional PM emission test is recommended to demonstrate compliance of the mentioned limit. The days in the interim between the violation date and the compliance test date could be treated as noncompliance while operating FGOO, unless Cargill Salt can demonstrate that the PM emission from the operation is in compliance with the requirements.

If Cargill Salt 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 Cargill Salt. 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,



Robert Elmouchi
Environmental Quality Analyst
Air Quality Division
586-753-3736

cc/via e-mail: Ms. Priscila Gavel, Cargill Salt
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Joyce Zhu, DEQ