



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



C. HEIDI GRETHUR
DIRECTOR

September 20, 2016

Mr. Adam Perry, Vice President of Operation
Global Titanium, Inc.
19300 Filer Avenue
Detroit, MI 48234

SRN: A8892, Wayne County

Dear Mr. Perry:

VIOLATION NOTICE

On September 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated a complaint of nuisance odors and emissions in the vicinity of Global Titanium, located at 19300 Filer Avenue, Detroit, Michigan. The purpose of the investigation was to determine Global Titanium'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 administrative rules; and to investigate the complaint which was received on September 9, 2016, regarding odors and emissions in the vicinity of Global Titanium.

Mr. Todd Zynda of the AQD performed the complaint investigation from approximately 9:40 PM to 10:40 PM on September 9, 2016 and observed the following air pollution violation:

Process Description	Rule/Permit Condition Violated	Comments
Wash Building 1 and Wash Building 2	R 336.1901(b)	Moderate (Level 3) burnt metal odors, attributable to Global Titanium's operations, impacting areas downwind of the facility.

R 336.1901(b) states, in part:

"A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property."

During the investigation of September 9, 2016, Mr. Zynda detected burnt metal odors in residential and commercial areas downwind of the facility which were traced back to Global Titanium. In the AQD staff's professional judgment, the odors observed were of sufficient intensity and frequency so as to constitute a violation of Rule 901(b).

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 11, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date 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.

If Global Titanium 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. Should you require any further information, please contact me.

Sincerely,



Jerry Krawiec
Senior Environmental Engineer
Air Quality Division
313-456-4682

cc: Ms. LaReina Wheeler, City of Detroit, BSEED

cc via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ
Mr. Todd Zynda, DEQ