

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





DAN WYANT DIRECTOR

October 6, 2015

CERTIFIED MAIL- 7010 0290 0000 3734 2491 RETURN RECEIPT REQUESTED

Mr. Gerry Hool, Plant Manager Guardian Industries 14600 Romine Road Carleton, Michigan 48117

Dear Mr. Hool:

SRN: B1877, Monroe County

VIOLATION NOTICE

On July 21, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Guardian Industries located at 14600 Romine Road, Carleton, Michigan. At that same time, Guardian Industries was conducting initial stack tests on Line #2 to determine compliance after the shakedown period of the newly installed control system consisting of a dry scrubber, particulate filter, and selective catalytic reduction. The purpose of this inspection and the stack tests was to determine Guardian Industries 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 Renewable Operating Permit (ROP) number MI-ROP-B1877-2014a.

During the inspection, staff observed the following:

	Rule/Permit	
Process Description	Condition Violated	Comments
EU00080 (Line #2)	S.C. I.10 / Rule 336.1225	Stack test for sulfuric acid mist had an average result of 13.3 lb/hr which is greater than their permitted limit of 1.6 lb/hr.

On September 30, 2015, AQD received a report of the results for the stack tests, which were conducted on July 21 and 22, 2015, indicated that the sulfuric acid mist emissions from the Line #2 process equipment are 13.3 pounds per hour.

The conditions of ROP MI-ROP-B1877-2014a, Table EU00080, Special Condition I.10 limit the emissions of sulfuric acid mist to 1.6 pounds per hour.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 27, 2015. 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.

If Guardian Industries 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 July 21, 2015. 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,

Brian Carley

Environmental Quality Specialist

Air Quality Division 517-780-7843

cc: Mr. Scott Miller, DEQ

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

Ms. Mary Ann Dolehanty, DEQ

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