



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



DAN WYANT
DIRECTOR

December 3, 2014

Ms. Amanda Davison
Environmental Health & Safety Coordinator
Fitzgerald Finishing
17450 Filer Avenue
Detroit, MI 48122

SRN: B3037, Wayne County

Dear Ms. Davison:

VIOLATION NOTICE

On September 23, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Fitzgerald Finishing located at 17450 Filer Avenue, Detroit, Michigan. The purpose of this inspection was to determine Fitzgerald Finishing'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 the conditions of Permit to Install (PTI) number 403-99C.

Based on review of the information provided to AQD staff during the inspection and records received on October 3, 2014 and November 25, 2014, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
FG-DIPSPIN	PTI 403-99C, FG-DIPSPIN, Special Condition I.2	Heavy Aromatic Naphtha Emissions exceeded daily limit of 157.6 lbs/day on the following occasions: 8/07/14, 8/11/14, 9/03/14, 9/10/14, and 9/15/14
FG-DIPSPIN	PTI 403-99C, FG-DIPSPIN, Special Condition III.1	During the inspection, some containers containing waste materials were observed opened.

The records provided demonstrate that actual emissions of Heavy Aromatic Naphtha from the FG-DIPSPIN process equipment are greater than the emission limit of 157.6 lbs/day.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 24, 2014 (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

Ms. Amanda Davison

Page 2

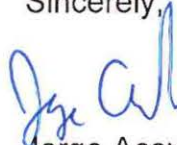
December 3, 2014

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 Fitzgerald Finishing 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 Fitzgerald Finishing. 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,



Jorge Acevedo
Senior Environmental Engineer
Air Quality Division
313-456-4679

cc: Ms. LaReina Wheeler, City of Detroit, Department of Environmental Affairs
cc via email: 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