



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 3, 2021

Mr. Bob Brenton
American Chemical Solutions, LLC
2406 Roberts Street
Muskegon, Michigan 49444

SRN: B4302, Muskegon County

Dear Mr. Brenton:

VIOLATION NOTICE

On July 21, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of American Chemical Solutions, LLC located at 2406 Roberts Street, Muskegon, Michigan. The purpose of this inspection was to determine American Chemical Solutions, LLC'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 17-19.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-WWStripper	PTI No. 17-19, EU-WWStripper, Special Condition I.1.	VOC emissions of 5.46 tpy, exceeding limit of 5.0 tpy.
FG-Facility	PTI No. 17-19, FG-Facility, Special Condition I.1.	Individual HAP emissions of 12.14 tpy, exceeding limit of 8.9 tpy.

The records provided demonstrate that actual emissions of Volatile Organic Compounds (VOCs) from the EU-WWStripper process equipment are 5.46 tpy. EU-WWStripper, Special Condition I.1 of PTI number 17-19 limits the emissions of VOCs to 5.0 tpy.

Additionally, the records provided demonstrate that actual emissions of an individual Hazardous Air Pollutant (HAP) from FG-Facility are 12.14 tpy. FG-Facility, Special Condition I.1 of PTI number 17-19 limits the emissions of individual HAPs to 8.9 tpy.

Mr. Bob Brenton
American Chemical Solutions, LLC
Page 2
September 3, 2021

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 24, 2021 (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.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If American Chemical Solutions, LLC 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 American Chemical Solutions, LLC. 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,



Scott Evans, M.P.H.
Environmental Quality Analyst
Air Quality Division
616-450-2072

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE