



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

May 20, 2022

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

SRN: B4302, Muskegon County

Dear Bob Brenton:

**VIOLATION NOTICE**

On March 17, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received stack test results from American Chemical Solutions, LLC, located at 2406 Roberts Street, Muskegon, Michigan. The purpose of the test was to determine American Chemical Solutions, LLC's compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 17-19.

Based on the test results, 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 were 10.95 tpy, exceeding limit of 5.0 tpy.
FGFacility	PTI No. 17-19, FGFacility, Special Condition I.1	Individual HAP emissions were 20.51 tpy of methanol, exceeding limit of 8.9 tpy.
Facility	Rule 210(1)	Major source of HAPs operating without a Renewable Operating Permit.

The test data provided demonstrate that actual emissions of 10.95 tons per year of volatile organic compounds (VOCs) exceed the emission limit established in PTI No. 17-19, EU-WWStripper, Special Condition I.1 of 5 tons per year, based on a 12-month rolling time period. In addition, emissions of methanol, a Hazardous Air Pollutant (HAP), from EU-WWStripper were found to be 20.51 tons per year, which exceeds the HAP limit of 8.9 tons per year, based on a 12-month rolling time period, established in PTI No. 17-19, FGFacility, Special Condition I.1

In addition, the methanol emissions exceed the Title V major source applicability threshold of 10 tons per year of any HAP that has been listed under section 112(b) of the clean air act as established in Rule 211(1)(a)(i)(A). Based on records of the past hours of operation, the threshold was exceeded approximately 12 months ago. Per Rule 210(4), for a stationary source that is or becomes a major source, as defined by Rule 211(1)(a)(i) to (iii), an administratively

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complete application shall be considered timely if it is received by the department not more than 12 months after the stationary source commences operation as a major source. To date, no Renewable Operating Permit application has been received which is a violation of Rule 210(1).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 10, 2022 (which coincides with 21 calendar days from the date of this letter). Be advised that correction of the above violations may include submitting an application for a Renewable Operating Permit. 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 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. 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  
Environmental Quality Analyst  
Air Quality Division  
616-450-2072

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