



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

November 20, 2017

Mr. Rodney Dobb
Jones Electric Company
1965 Sanford Street
Muskegon, Michigan 49441

SRN: F7434, Muskegon County

Dear Mr. Dobb:

VIOLATION NOTICE

On October 17, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Jones Electric Company located at 1965 Sanford Street, Muskegon, Michigan. The purpose of this inspection was to determine Jones Electric Company'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 197-05.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Burn-off Oven (EU-BURNOFF)	Rule 910	Failure to conduct necessary maintenance and maintain a minimum afterburner temperature of 1,400°F
	PTI No. 197-05, Special Condition (SC) IV.1	
	PTI No. 197-05, SC IV.4 & VI.1	Failure to monitor and record afterburner temperature at least once every 15 minutes
	PTI No. 197-05, SC VI.2	Failure to conduct 2016 thermocouple calibration
	PTI No. 197-05, SC VIII.1	Installation of a rain cap

A records review indicated that the facility was operating the afterburner for the burn-off oven at temperatures lower than 1,400°F. This is a violation of PTI No. 197-05, SC IV.1, which requires the facility to operate the afterburners at a minimum temperature of 1,400°F. This also constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

During this inspection, Jones Electric Company was unable to produce afterburner temperature records from approximately September 4, 2016 through November 1, 2017. This is a violation of the monitoring and recordkeeping specified in SC IV.4 and VI.1 of PTI No. 197-05. The conditions of PTI No. 197-05, SC IV.4 and VI.1 require records of afterburner temperatures at least once every 15 minutes, which shall be made available for review upon request by the AQD staff.

Mr. Rodney Dobb
Jones Electric Company
Page 2
November 20, 2017

Per conversations with Mr. Dobb, Jones Electric Company did not conduct a 2016 thermocouple calibration. This is a violation of PTI No. 197-05, SC VI.2.

It was also noted that the stack for the burn-off oven is equipped with a rain cap. This is a violation of PTI No. 197-05, SC VIII.1, which requires exhaust gases to be discharged unobstructed vertically upwards to ambient air. Rain caps are considered an obstruction and promote horizontal discharge, not vertical, preventing proper dispersion.

Per correspondence on November 2, 2017 and November 9, 2017, steps were taken to correct the cited violations for low operating temperatures, missing data and yearly calibrations. Based on this documentation, a response is only necessary to address the rain cap.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 11, 2017 (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.

If Jones Electric Company 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 Jones Electric Company. 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,



Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-356-0259

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ