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June 19, 2014

Mr. Jonathan Lamb
Senior Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
3058 West Grand Boulevard, Suite 2-300
Detroit, MI 48202

Via Federal Express and Email

RE: M4545, Wayne County, AQD Violation Notice Dated May 22, 2014

Dear Mr. Lamb:

This letter is in response to the "Violation Notice" dated May 22, 2014. In the letter, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) notified EQ Detroit, Inc. (EQD) of the violation noted below. Based on a phone and email conversation on June 12, 2014, you granted EQD an extension to the June 12, 2014 deadline for responding to the NOV to that of June 19, 2014. The following provides a response to the alleged violations listed in that letter.

Process Description	Rule/Permit Violated	Condition	Comments
Chem-Fix	R336.1901(b)		Strong (Level 3) chemical and fertilizer-type odors observed emitting from the facility and impacting the neighborhood downwind.

EQD believes the above observation made on May 21, 2014 is inaccurate and does not constitute violations of the legal requirements cited. It is noted the investigation took place between approximately 4:15 PM to 5:00 PM. Both the Director of Operations and QEHS Manager conducted an audit throughout the site between 2:30 PM until 4:00 PM and did not detect strong odors.

As discussed at the EQD/MDEQ meeting on June 4, 2014, EQD is also disappointed that you did not immediately follow up on the alleged "Strong (Level 3)" odor by entering the Facility to discuss the issue with EQD personnel. Because there was no immediate contact with EQD, there is no way to confirm the odor was coming from our site and there is no way of investigating the odor that you, alone, detected. Moreover, as the observed event occurred

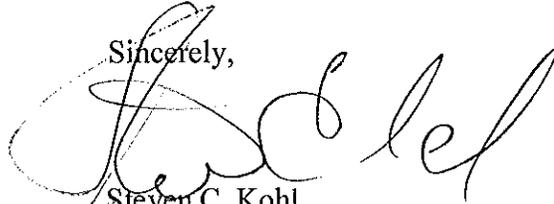
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during normal business hours, EQD would expect that their site would be immediately contacted by the MDEQ and requested to abate the condition giving rise to any observed nuisance odor. As an additional note, EQD is not aware of any current legal or regulatory requirement related to a level rating for odors. Please provide a regulatory basis for this level rating.

EQ Detroit, Inc. takes these matters very seriously and continues to make every effort to stay on top of them.

If you have any further questions, please contact Krystal Brown at (313) 347-1328 or krystal.brown@eqonline.com or me at (248) 784-5141 or skohl@wnj.com.

Sincerely,



Steven C. Kohl

SCK/lbg

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