



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT FIELD OFFICE



DAN WYANT  
DIRECTOR

May 22, 2014

Ms. Krystal Brown, QEHS Manager  
EQ Detroit  
1923 Frederick St.  
Detroit, MI 48211

SRN: M4545, Wayne County

Dear Ms. Brown:

**VIOLATION NOTICE**

On May 21, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), investigated a complaint of nuisance odors downwind of EQ Detroit, located at 1923 Frederick St., Detroit, Michigan. The purpose of this inspection was to determine EQ Detroit'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, the conditions of Permit to Install (PTI) number 269-04D, and to investigate the complaint which we received on May 21, 2014, regarding odors attributed to EQ Detroit's operations.

AQD staff, Jonathan Lamb, performed the investigation and observed the following violation:

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

The investigation was performed from approximately 4:15 PM to 5:00 PM on May 21, 2014. During the investigation, strong, consistent chemical and fertilizer-type odors were observed in the residential area downwind of EQ Detroit, bounded by St. Aubin to the west, Ferry to the north, Joseph Campau to the east, and Frederick to the south, and traced back to EQ Detroit. These odors were not observed upwind of EQ Detroit. In my professional judgment, the odors observed were of sufficient intensity and duration so as to constitute a violation of Rule 901(b), which states, in part:

"A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property."

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 12, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If EQ Detroit 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 violation cited above and for the cooperation that was extended to me during my inspection of EQ Detroit. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-456-4683

cc: Ms. LaReina Wheeler, City of Detroit  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ