



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREYER  
DIRECTOR

October 25, 2017

Mr. Thomas P. Houle, Terminal Manager  
Dana Container Inc.  
11430 Russell Street  
Detroit, Michigan 48211-1072

SRN: M4626, Wayne County

Dear Mr. Houle:

**VIOLATION NOTICE**

On July 7, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Dana Container Inc. located at 11430 Russell Street, Detroit, Michigan. The purpose of this inspection was to determine Dana Container Inc.'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 125-07.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-DRAINRACK; FG-SP-7760A; FG-FACILITY	PTI Number 125-07, Special Conditions (SC) 1.5 through 1.7, 2.10 through 2.14, 3.2 and 3.3	The facility was unable to provide the various records required under the PTI for volatile organic compound (VOC) emissions, hazardous air pollutant (HAP) emissions, tote weights and shipments, solvent usage, solvent temperatures, and solvent vapor pressures.

During this inspection, Dana Container, Inc. was unable to produce emission records pertaining to volatile organic compound (VOC) emissions, hazardous air pollutant (HAP) emissions, tote weights and shipments, solvent usage, solvent temperatures, and solvent vapor pressures. These are violations of the recordkeeping requirements specified in Special Condition numbers 1.5 through 1.7, 2.10 through 2.14, 3.2, and 3.3 of PTI number 125-07.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 15, 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

Mr. Thomas P. Houle

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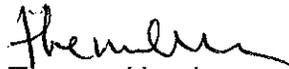
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violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Dana Container Inc. 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 July 7, 2017. 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,



Terseer Hemben  
Environmental Engineer  
Air Quality Division  
313-456-4677

cc: Ms. LaReina Wheeler, City of Detroit, BSEED

cc via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Chris Ethridge, DEQ

Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski, DEQ