



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

June 7, 2016

Mr. Tim Campbell
Project Manager - Bioprocess Operations
MBI International
3900 Collins Road
Lansing, MI 48910

SRN: N1162, Ingham County

Dear Mr. Campbell:

VIOLATION NOTICE

On March 9, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of MBI International (MBI) located at 3900 Collins Road, Lansing. The purpose of this inspection was to determine MBI'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 and the conditions of General Permit to Install (PTI) number 127-07.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Anhydrous ammonia tank and handling system	Special Condition No. 1.3 of General PTI No. 127-07	Unable to verify that annual review and approval of emergency response plan with local fire department has taken place.
Anhydrous ammonia tank and handling system	Special Condition No. 1.16 of General PTI No. 127-07	Sign not conspicuously placed at facility entrance.
Anhydrous ammonia tank and handling system	Special Condition No. 1.20 of General PTI No. 127-07	Records not kept of dates of annual review and approval of emergency response plan with local fire department.

During the inspection, it appeared that records have not been kept in recent years of dates of annual review and approval of the emergency response plan with the local fire department. This constitutes a violation of Special Condition No. 1.20 of General PTI No. 127-07. It has been noted, however, that on March 18, 2016, MBI subsequently forwarded a copy of MBI's site specific emergency response plan, dated March, 2013.

Because of the absence of records of annual review and approval of the emergency response plan with the local fire department, it cannot be substantiated that the required annual review has actually occurred in recent years. This constitutes a violation of Special Condition No. 1.3 of General PTI No. 127-07.

Additionally, during the inspection, a sign with emergency contact phone numbers was located inside the MBI building, near the doorway closest to the anhydrous ammonia tank itself. This constitutes a violation of the permit, because it does not meet the intent of Special Condition No. 1.16 of general PTI No. 127-07, which states:

"A sign shall be present and conspicuously placed at the facility entrance (emphasis added) stating the emergency phone numbers for the owner, primary operator, local and state police, local fire department, and ambulance service. [R336.1201a(1)]"

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 28, 2016. 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 MBI 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 MBI. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-284-6638

DAM:TG

cc/via e-mail: Mr. Thomas Grover, MSU
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Daniel McGeen, DEQ