



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



AARON B. KEATLEY
ACTING DIRECTOR

May 12, 2023

Brian Dillon
Emerald Corporation
4949 West Greenbrooke SE
Kentwood, Michigan 49512

SRN: N3044, Kent County

Dear Brian Dillon:

SECOND VIOLATION NOTICE

On May 3, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received and reviewed updated records from Emerald Corporation, located at 4949 West Greenbrooke SE, Kentwood, Michigan. The purpose of the records review was to determine Emerald Corporation's compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 401-08.

On September 1, 2022, the AQD sent Emerald Corporation a Violation Notice citing catalytic oxidizer destruction efficiency and volatile organic compound (VOC) emission limit violations discovered during an inspection and stack test. The AQD recognizes that repairs to the catalytic oxidizer for control of VOCs were completed in February 2023, and a subsequent stack test report received on April 25, 2023, indicates that the unit is now achieving an 86% destruction efficiency (note the report is still undergoing review by the Technical Programs Unit). At the time of this letter, the VOC emission exceedances are ongoing due to the delay of the catalytic oxidizer repairs and the limit being based on a 12-month rolling time period. In response to this letter, please notify the AQD within 15 days after the first month when emissions calculations indicate compliance with both the monthly and 12-month rolling VOC limit.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring Emerald Corporation into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE