



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

September 28, 2016

Mr. Mike Brewers
Mercury Displacement Industries
25028 US-12 East
Edwardsburg, Michigan 49112

SRN: N5886, Cass County

Dear Mr. Brewers:

VIOLATION NOTICE

On June 6, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Mercury Displacement Industries (Facility), located at 25028 US-12 East, Edwardsburg, Michigan. The purpose of this inspection was to determine the Facility'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); and the administrative rules.

During the inspection, staff of the AQD observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|--|--------------------------------|---|
| Two unpermitted mercury filling operations that vent to the outside air. | R 336.1201(1) (Rule 201) | Mercury was detected outside at the vent and on the ground under the vent. |
| Two unpermitted vacuum welding operations that vent to the outside air. | R 336.1201(1) (Rule 201) | Mercury was detected outside at the vent pipe of each welder and on the ground underneath the vent pipes. |
| Unpermitted soldering operations that vent to the outside air. | R 336.1201(1) (Rule 201) | Mercury was detected at the outside vent and on the ground under the vent. |

During this inspection, it was noted that the Facility had installed and commenced operation of unpermitted process equipment at this Facility.

A program for compliance may include a completed Permit to Install application for the unpermitted process equipment. An application form is available by request or at the following website: http://www.deq.state.mi.us/aps/nsr_information.shtml

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Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process, or process equipment that may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 20, 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 the Facility 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 the Facility. 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,



Dennis Dunlap
Environmental Quality Specialist
Air Quality Division
269-567-3553

DD:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ
Ms. Amanda Chapel, DEQ