



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 2, 2019

Mr. Todd Buhler
Advanced Technology Services, Inc.
12400 Belden Court
Livonia, Michigan 48150

SRN: N7257, Wayne County

Dear Mr. Buhler:

VIOLATION NOTICE

On July 2, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Advanced Technology Services, Inc. (ATS) located at 12400 Belden, Livonia, Michigan. The purpose of this inspection was to determine ATS'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) 95-03.

As a result of the inspection on July 2, 2019, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
EUBURNOFF	PTI 95-03, Special Condition 1.14	The stack for the EUBURNOFF was equipped with a rain cap.
Torch Type Burn-Off Unit	R 336.1201(1)	The natural gas fired torch type burn-off unit was installed without obtaining a PTI.

EUBURNOFF

PTI 95-03, Special Condition (SC) 1.14 requires that "exhaust gases from EUBURNOFF shall be discharged unobstructed vertically upwards to the ambient air." During the inspection it was observed that stack is obstructed with the installation of a rain cap. This is a violation of PTI 95-03, SC 1.14.

Torch Type Burn-Off Unit

During the inspection on July 2, 2019, it was noted that ATS had installed a torch type burn-off unit. This is a violation of R 336.1201 (Rule 201) of the administrative rules promulgated under Act 451.

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A program for compliance may include a completed PTI application for the torch type burn-off unit. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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 which may be a source of an air contaminant.

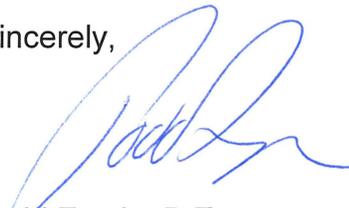
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 23, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the 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.

Please submit the written response to EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If ATS 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 ATS. 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,



Todd Zynda, P.E.
Senior Environmental Engineer
Air Quality Division
313-456-2761

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Wilhemina McLemore, EGLE
Mr. Jeff Korniski, EGLE