



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

January 2, 2019

**CERTIFIED MAIL- 7015 0920 0002 3516 7833**  
**RETURN RECEIPT**

Mr. Adam Gibson  
W2Fuel Adrian  
1571 West Beecher Rd  
Adrian, MI 49221

SRN: N7927, Lenawee County

Dear Mr. Gibson:

**VIOLATION NOTICE**

On December 17, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of W2Fuel Adrian (Company) located at 1571 West Beecher Road, Adrian Michigan. The purpose of this inspection was to determine the Company'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 associated Air Pollution Control Rules and Permit to Install (PTI) 89-17A.

During the inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Biodiesel production facility.	PTI 89-17A. Permit Condition FGNSPSVVA; NSPS 40 CFR Part 60 Subpart VVa-Equipment leaks of VOC in the Synthetic Organic Chemical Manufacturing Industry.	Permit conditions for FGNSPSVVA are not being met. Required LDAR style leak detection of process equipment has yet to occur. Required initial performance tests not completed. Required semi-annual NSPS reports have not been submitted. A previous Violation Notice was issued on 2/06/2017 for non-compliance with NSPS VVa.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 23, 2019. 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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit written response to the DEQ, AQD Jackson District, at 301 East Louis B. Glick Highway Jackson, Michigan 49201 and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company 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 this Company. 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,



Mike Kovalchick  
Senior Environmental Engineer  
Air Quality Division  
517-416-5025

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ

Mr. Jay Olaguer, DEQ

Mr. Chris Ethridge, DEQ

Ms. Jenine Camilleri, DEQ