



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 18, 2013

Mr. Mark DeLisle
Lakeshore Reclamation & Resale
5050 South Sprinkle Road
Portage, Michigan 49002

SRN: P0425, Kalamazoo County

Dear Mr. DeLisle:

VIOLATION NOTICE

On November 26, and December 10, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Lakeshore Reclamation & Resale (Facility), located at 9702 Portage Road, Portage, 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); the administrative rules; and the conditions of Permit to Install (PTI) No. 34-13.

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

Process Description	Rule/Permit Condition Violated	Comments
Hydraulic Shear	R 336.1201 (Rule 201)	The Facility has installed and operated a hydraulic shear to process stator bars containing asbestos without obtaining a permit.
EUWireStripper	PTI No. 34-13, Condition IV.3 and VI.2	The Facility is not recording the pressure differential on the enclosure on an hourly basis.
EUWireStripper	PTI No. 34-13, Condition V.1 and 2	It does not appear that samples required in V.1 are being verified by an outside contractor every fifth operating day.
EUWireStripper	PTI No. 34-13, Condition VI.1	The Facility has not performed any visible emission readings.
EUWireStripper	PTI No. 34-13, Condition VII.1 and 2, 40 CFR 61.145	The Facility has not submitted any of the required notifications.

EUWireStripper	PTI No. 34-13, Condition VIII.1	The exhaust is not emitted through a stack, but into the building. This changes the parameters of the modeling that was performed.
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During this inspection, it was noted that the Facility had commenced operation of an unpermitted hydraulic shear. The AQD staff advised the Facility on December 10, 2013, that this is a violation of Rule 201 of Act 451.

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.

During this inspection, the Facility was unable to produce visible emission records and admitted they were not performing the readings. They are also only keeping records of the enclosure pressure drop at the beginning and end of the work shift, instead of hourly. These are violations of the monitoring and recordkeeping requirements specified in Special Conditions Numbers IV.3, VI.1, and 2 of PTI No. 34-13.

The sampling required in PTI No. 34-13, Condition V.1, is not being recorded properly. The log is not in chronological order and is not always filled out completely. Therefore, it is difficult to determine compliance. It does not appear that the third party verification required by Condition V.2 is occurring as required. The one test result provided appears to show that the sample was from a day that the process was not operating. There is no corresponding sample analyzed by DeLisle Associates to compare to the results.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 8, 2014. 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 recurrence.

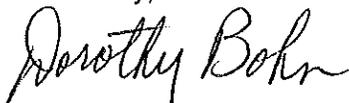
If the Facility believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position. Also by January 8, 2014, please provide the information still outstanding as discussed on December 10, 2013:

1. The certification on the percent efficiency of the HEPA filter in use.
2. The copies of the results of other samples analyzed by the third party.
3. The notification of installation of the equipment stating when it was installed.
4. A notification of all days that processing has occurred.

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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,



Dorothy Bohn
Senior Environmental Quality Analyst
Air Quality Division
269-567-3552

DB:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Karen Kajiya-Mills, DEQ
Ms. Mary Douglas, DEQ