



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 31, 2023

VIA E-MAIL

Savanah Humphrey, Plant Manager
Elite Cleanroom Services
548 South Court Street
Lapeer, Michigan 48446

SRN: P0455, Lapeer County

Dear Savanah Humphrey:

VIOLATION NOTICE

On June 21, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Elite Cleanroom Services located at 548 S. Court Street, Lapeer, Michigan. The purpose of this inspection was to determine Elite Cleanroom Services' 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) number 101-13B; and to investigate a recent complaint which we received on June 13, 2023, regarding odors attributed to Elite Cleanroom Services' operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Industrial laundry washing and drying processes	PTI 101-13B, FG-LAUNDRY SCI.1	The AQD requested data to support the company's belief that 55% of volatile organic compound (VOC) emissions are captured in water. In the absence of supporting data, uncontrolled annual VOC emissions of 18.71 tons appear to exceed the 10.7 tons per year (TPY) limit for FG-LAUNDRY.

EMISSIONS REPORTED OR OBSERVED

Review of submitted VOC recordkeeping showed that 12-month rolling VOC emissions in January 2023, were 8.43 tons based on the company's belief that 55% of the VOC

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emissions were captured in water. On August 25, and again on September 21, 2023, the AQD requested data to support this. As of this date, the AQD has not received any supporting data. Without the benefit of any VOC reduction, the uncontrolled 12-month rolling VOC emissions from Elite Cleanroom Services appear to have been 18.71 tons in January 2023, over the 10.7 TPY limit specified in PTI 101-13B, FGLAUNDRY, SC I.1.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 21, 2023, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is 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 the written response to Daniel McGeen at EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, First Floor South, Lansing, Michigan 48909 or mcgeend@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Elite Cleanroom Services 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 violation cited above and for the cooperation that was extended to me during my inspection of Elite Cleanroom Services. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE