



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 28, 2021

Mr. Mike Anderson
Bluewater Thermal Solutions
800 S. Fair Street
Benton Harbor, Michigan 49022

SRN: U112103163, Berrien County

Dear Mr. Anderson:

VIOLATION NOTICE

On June 23, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a complaint investigation / inspection of Bluewater Thermal Solutions (Facility) located at 800 S. Fair Street, Benton Harbor, Michigan. The purpose of this inspection was to determine the Facilities 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 to investigate a recent complaint which we received on June 21, 2021, regarding black smoke and foul odors attributed to Facility operations.

During the complaint investigation / inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Eight (8) Heat Treat Furnaces	Rule 336.1201 (Permits to Install (PTI)) of Part 55 (Air Pollution Control Rules)	See Comment 1 Below
Six (6) Temper Furnaces	Rule 336.1201 (Permits to Install (PTI)) of Part 55 (Air Pollution Control Rules)	See Comment 2 Below
Anhydrous Ammonia Tank - 1,000 Gallons	Rule 336.1201 (Permits to Install (PTI)) of Part 55 (Air Pollution Control Rules)	See Comment 3 Below

Comment 1: The Facility has been operating eight (8) Heat Treat furnaces without having a PTI issued for them by the AQD. These furnaces do not meet a permit exemption because they utilize oil quenching and ammonia injection.

Comment 2: The Facility has been operating six (6) Temper Furnaces without having a PTI issued for them by the AQD. These furnaces do not meet a permit exemption because the parts still have some residual oil on them when placed into the furnaces.

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Comment 3: The facility has a 1,000 gallon Anhydrous Ammonia tank that they've been using without a PTI issued for it by the AQD. This tank is not exempt from permitting because it is over 500 gallons.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 27, 2021. 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, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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 number listed below.

Sincerely,



Matt Deskins
Senior Environmental Quality Analyst
Air Quality Division
269-303-8326

Cc via e-mail: Ms. Carolyn Moscardelli, Bluewater Thermal Solutions
Mr. Jim Hedman, Bluewater Thermal Solutions

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE