



RICK SNYDER
GOVERNOR

B1877-VN 20160105

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

January 5, 2016

CERTIFIED MAIL – 7007 3020 0002 7737 4580
RETURN RECEIPT REQUESTED

Mr. Gerry Hool
Guardian Industries
14600 Romine Road
Carleton, Michigan 48117

SRN: B1877, Monroe County

Dear Mr. Hool:

VIOLATION NOTICE

On October 22, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Guardian Industries located at 14600 Romine Road, Carleton, Michigan. The purpose of this inspection was to determine Guardian Industries 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 Renewable Operating Permit (ROP) number MI-ROP-B1877-2014a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU00080 (Line #2)	S.C. I.10 / Rule 336.1225	Stack test for sulfuric acid mist had an average result of 1.95 lb/hr which is greater than their permitted limit of 1.6 lb/hr.

On December 15, 2015, AQD received a report of the results for the stack tests, which were conducted on October 22, 2015, indicated that the sulfuric acid mist emissions from the Line #2 process equipment are 1.95 pounds per hour.

The conditions of ROP MI-ROP-B1877-2014a, Table EU00080, Special Condition I.10 limit the emissions of sulfuric acid mist to 1.6 pounds per hour.

Guardian Industries has recently entered into a Consent Decree with EPA, which covers facilities located in Kingsburg, California, DeWitt, Iowa, Carleton, Michigan, Geneva, New York, Floreffe, Pennsylvania, Richburg, South Carolina, and Corsicana, Texas.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 26, 2016. 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.

If Guardian Industries 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 Guardian Industries. 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,



Brian Carley
Environmental Quality Specialist
Air Quality Division
517-780-7843

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Mr. Tim Lemmon, Guardian Industries
Ms. Sarah Marshall, EPA Region 5
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ