

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY DETROIT



C. HEIDI GRETHER
DIRECTOR

November 29, 2017

Mr. Matthew Craig, Plant Manager US Gypsum 10090 West Jefferson Ave. River Rouge, MI 48218

Dear Mr. Craig:

SRN: B3518, Wayne County

VIOLATION NOTICE

On August 25, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of US Gypsum located at 10090 West Jefferson Ave., River Rouge, Michigan. The purpose of this inspection was to determine US Gypsum'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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B3518-2011.

During the inspection, staff observed the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Granular System (EU-9)	MI-ROP-B3518-2011, Special Conditions EU-9, V.1 and IX.1 and Appendix 2-1; 40 CFR 60.672(b)	Initial performance testing for visible emissions from these units has not been performed as required by Subpart OOO.
Raymond Mill (EU-23)	MI-ROP-B3518-2011, Special Conditions EU-23, V.1 and IX.1 and Appendix 2-1; 40 CFR 60.672(b)	Initial performance testing for visible emissions from these units has not been performed as required by Subpart OOO.
HRA Landplaster Bin (EU-35)	MI-ROP-B3518-2011, Special Conditions EU-35, V.1 and IX.1 and Appendix 2-1; 40 CFR 60.672(b)	Initial performance testing for visible emissions from these units has not been performed as required by Subpart OOO.

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The Granular System (EU-9), Raymond Mill (EU-23), and HRA Landplaster Bin (EU-35) are subject to the federal Standards of Performance for New Sources (NSPS) for Nonmetallic Mineral Processing Plants. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart OOO. 40 CFR 60.672(d) requires initial performance testing of the building enclosing the affected units to demonstrate compliance with the opacity limit of 7 percent, as specified in 40 CFR 60.672(e)(1), within 180 days of initial startup of the affected units. This compliance demonstration is to be performed in accordance with the testing methodology described in 40 CFR 60.675(d)(2).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 20, 2017 (which coincides with 21 calendar days from the date of this letter). 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.

If US Gypsum 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 US Gypsum. 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,

Jonathan Lamb

Senior Environmental Quality Analyst

Air Quality Division 313-456-4683

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Chris Ethridge, DEQ

Mr. Thomas Hess, DEQ

Ms. Wilhemina McLemore, DEQ

Mr. Jeff Korniski, DEQ