



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 18, 2022

Raj Minhas, President & Chief Operating Officer
Lockhart Chemical Company
4302 James P. Cole Boulevard
Flint, Michigan 48505

SRN: B6179, Genesee County

Dear Raj Minhas:

VIOLATION NOTICE

On May 17, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received copies of recordkeeping from Lockhart Chemical Company (Lockhart Chemical) located at 4302 James P. Cole Boulevard, Flint, Michigan. These records had been requested by the AQD, in follow up to the April 13, 2022, joint inspection of Lockhart Chemical by the United States Environmental Protection Agency (EPA) and the AQD, and the continuation of the inspection on May 5, by AQD. These documents were reviewed for the purpose of determining Lockhart Chemical'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 Permit to Install (PTI) number 26-16.

As a result of reviewing records dating from April 1, 2021, through March 31, 2022, staff observed the following violations:

Process Description	Rule/Permit Condition Violated	Comments
EUOxidation216	PTI 26-16, Special Condition (SC) IV.1; Rule 910	On December 16, 2021, a temperature chart recording for the thermal oxidizer showed a temperature drop of 210 degrees F below the 1400 degrees F required minimum temperature.
EUCalcium	PTI 26-16, SC VI.1	Required records of pressure drop for the EUCalcium bag filter were not available.

Temperature charts for the thermal oxidizer associated with EUOxidation216 were received from April 1, 2021, through April 1, 2022. Out of 195 dates of operation of EUOxidation216, the date of December 16, 2021, showed a sudden but brief drop of the thermal oxidizer temperature to 1190 degrees F. This is a violation of PTI 26-16, SC EUOxidation216, IV.1, which requires that the thermal oxidizer be installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the thermal oxidizer is defined, in part, as maintaining a minimum temperature of 1400 degrees F in the thermal oxidizer.

This also constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Additionally, the EUOxidation216 under/over temperature controller, or at least its display, did not appear to be working on April 13, 2022, as the setpoint or SP fluctuated from as low as 1070 degrees F, to as high as 1350 degrees F. This does not appear to be a Rule 910 violation at this time, because this controller is not known to the AQD to be part of an air-cleaning device. However, the AQD requests that Lockhart provide an explanation of the function of this controller as it relates to EUOxidation216.

Lastly, the requested records covering the time period of April 1, 2021, through March 31, 2022, did not include records of pressure drop for EUCalcium. This is a violation of SC PTI 26-16, EUCalcium, SC VI.1, which requires that the permittee monitor and record, in a satisfactory manner, the pressure drop for the bag filter once during each batch.

The issues identified in this Violation Notice result from a review of recordkeeping which was completed after the recent Violation Notice of June 27, 2022, had already been sent by AQD. We have received Lockhart Chemical's response to this first Violation Notice on August 5, 2022, and are reviewing the corrective action program described therein.

The Lockhart Chemical response letter received on August 5 indicates, in part, that for FGLime540-541, no records were kept on the maintenance of the lime silo, but they will be available, moving forward. This past lack of documentation was a violation of PTI No. 26-16, FGLime540-541, SC VI.4, which requires keeping a record of actions taken under the lime storage silo preventive maintenance program. This has been addressed, however, by the written commitment to keep the required record, and does not need to be addressed in your response to this Violation Notice.

The issues identified in this VN result from a review of recordkeeping which was completed after the recent VN of June 27, 2022, had already been sent by the AQD. We have received Lockhart Chemical's response to this first VN on August 5, 2022, and are reviewing the corrective action program described therein.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 8, 2022, (which coincides with 21 calendar

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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.

Please submit the written response to EGLE, AQD, Lansing District, at Constitution Hall, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lockhart Chemical 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 of Lockhart Chemical in these matters. 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,



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

cc: Valeria Apolinario, EPA
Brittany Cobb, EPA
David Sutlin, EPA
Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Bob Byrnes, EGLE