



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

April 2, 2015

Ms. Susan Hawks-Johnson, President
S & H Sorting and Packing, Inc.
2401 20th Street
Port Huron, MI 48060

SRN: B8626, St. Clair County

Dear Ms. Hawks-Johnson:

VIOLATION NOTICE

On March 11, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of your facility located at 2401 20th Street, Port Huron, Michigan. The purpose of this inspection was to determine your facility'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 administrative rules and the conditions of Permit to Install No. 111-08.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBURNOFF	PTI No. 111-08, special condition 1.7	Afterburner temperature not meeting the 1400°F permit limit from May 27, 2014 through present on most operating days.
EUBURNOFF	PTI No. 111-08, special conditions 1.8, 1.9, and 1.10	Temperature interlock system not operating properly.
EUBURNOFF	PTI No. 111-08, special condition 1.13	The device to continuously monitor afterburner temperature is not working properly.

During the AQD staff inspection, your records showed that you were operating the burnoff oven with the afterburner (secondary chamber) temperature below the 1400°F and in violation of PTI No. 111-08, special condition 1.7.

Since you were able to operate the main combustion chamber at a time when your secondary combustion chamber temperature was below 1400°F, then your interlock system was not operating properly. This means you are in violation of PTI No. 111-08, special conditions 1.8, 1.9, and 1.10.

Mr. Guzdial, Operations Manager, also mentioned that there's a difference between the recorded datalogger temperature (lower) and the digital temperature sensor display (higher) directly attached to the oven unit. This may potentially be noncompliant with PTI No. 111-08, special condition 1.13.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 23, 2015 (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 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 your 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,



Remilando Pinga
Senior Environmental Engineer
Air Quality Division
586-753-3744

RP/DC

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ