



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT FIELD OFFICE



DAN WYANT
DIRECTOR

January 22, 2014

Mr. John Frost, General Manager
Environmental GEO-Technologies, LLC
28470 Citron Drive
Romulus, MI 48174

SRN: M4796, Wayne County

Dear Mr. Frost:

VIOLATION NOTICE

On January 10, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), met with representatives of Environmental GEO-Technologies, LLC (EGT), located at 28470 Citron Drive, Romulus, Michigan. The purpose of this meeting was to discuss EGT'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 (PTI) number 539-97E following the transfer of facility operations from the original permittee, RDD, to EGT, effective April 2012.

During this meeting, EGT brought to AQD's attention that the facility had yet to fulfill the following testing requirement of PTI No. 539-97E:

Process Description	Rule/Permit Condition Violated	Comments
FGTANKS	PTI No. 539-97E; FGTANKS, S.C. V.1	Facility did not perform testing of VOC emission rates prior to the permit deadline of July 31, 2013.

AQD is aware that the facility was not accepting or processing waste from the time of permit issuance in September 2011 until November 2013, and was therefore unable to perform emissions testing prior to the July 31, 2013, deadline specified in FGTANKS, Special Condition V.1 of PTI No. 539-97E. However, since the facility did not apply for a permit modification or request an extension of the testing deadline prior to July 31, 2013, this permit condition is determined to be in noncompliance until EGT conducts the required testing of VOC emission rates from FGTANKS, at which time this violation will be considered resolved.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 12, 2014 (which coincides with 21 calendar days from the date of this letter). 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 EGT 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.

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Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to us during our meeting on January 10, 2014. 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,

A handwritten signature in black ink, appearing to read "Jonathan Lamb". The signature is cursive and somewhat stylized.

Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ