



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

October 14, 2016

Mr. Allen Jones, General Manager  
Nortru, LLC  
421 Lycaste St.  
Detroit, MI 48214

SRN: N0731, Wayne County

Dear Mr. Jones:

**VIOLATION NOTICE**

On April 26 and September 19, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Nortru, LLC (Nortru), located at 421 and 515 Lycaste St., Detroit, Michigan. The purpose of this inspection was to determine Nortru'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; the conditions of Renewable Operating Permit (ROP) number MI-ROP-N0731-2009; and the conditions of Permit to Install (PTI) Nos. 84-04C, 84-04B, and 184-13.

During the inspection, the following violations were observed:

Process Description	Rule/Permit Condition Violated	Comments
FG-CONTNROFFLOAD	ROP No. MI-ROP-N0731-2009, FG-ContrnOffload, S.C. VI.1;  PTI No. 84-04C, FG-CONTNROFFLOAD, S.C. VI.1.	Facility failed to monitor and record, in a satisfactory manner, records of the number of containers processed in FG-CONTNROFFLOAD on a monthly and 12-month rolling time period basis.
FG-CONTNROFFLOAD	ROP No. MI-ROP-N0731-2009; FG-ContrnOffload, S.C. VI. 2 and VI.3;  PTI No. 84-04C, FG-CONTROFFLOAD, S.C. VI.2 and VI.3.	Facility failed to monitor and record, in a satisfactory manner, the average benzene, formaldehyde, and chloroform concentrations on a monthly basis.
FG-CONTNROFFLOAD	PTI No. 84-04C, FG-CONTROFFLOAD, S.C. VI.4 and VI.5.	Facility failed to monitor and record, in a satisfactory manner, the permanganate concentration of the scrubber twice per day to verify that the

		permanganate concentration in the scrubber was maintained at a minimum of 3% by weight.
FG-BlendingTanks	PTI No. 84-04B, FG-BlendingTanks, S.C. VI.6.	Facility failed to monitor and record, in a satisfactory manner, records of the composition of the material last stored in any tank in FG-BlendingTanks prior to clean out.
FG-TruckTransfer	ROP No. MI-ROP-N0731-2009, FG-TruckTransfer, S.C. III.3;  PTI No. 84-04B, FG-TruckTransfer, S.C. III.3;  R 336.1911.	Facility did not implement and maintain an approved malfunction abatement plan (MAP) for FG-TruckTransfer.
FG-TruckTransfer	PTI No. 84-04B, FG-TruckTransfer, S.C. VI.2 and VI.3.	Facility failed to monitor and record, in a satisfactory manner, the FG-TruckTransfer throughput of each specific product for each calendar month and 12-month rolling time period.
FG-TruckTransfer	PTI No. 84-04B, FG-TruckTransfer, S.C. VI.1 and VI.2.	Facility failed to maintain monthly records of truck transfers in FG-TruckTransfer in a format acceptable to AQD.
FGFACILITY	PTI No. 84-04B, FGFACILITY, S.C. VI.1 and VI.3;  40 CFR 61.342(g);  40 CFR 61.355.	Facility failed monitor and record, in a satisfactory manner, the total benzene processed in FGFACILITY on a monthly and 12-month rolling time period.
FG-TruckTransfer; FG-ContnrOffload	ROP No. MI-ROP-N0731-2009; G.C. 19, 21, and 22;  R 336.1213(3)(c);  R 3361213(4)(c).	The Responsible Official submitted annual and semi-annual ROP certifications in 2015 and 2016 that failed to report deviations which should have been reported based on reasonable inquiry.

During the inspection, Nortru failed to provide the required records listed in the table above in a format acceptable to AQD for the time period beginning April 2014 through April 2016. As a result, at the time of inspection AQD was unable to determine Nortru's compliance with the conditions of ROP No. MI-ROP-N0731-2009, PTI Nos. 84-04C and 84-04B, and 40 CFR Part 61, Subpart FF. In addition, records were not available to allow the AQD to adequately evaluate the applicability of the following federal standards: 40 CFR Part 61, Subpart DD; 40 CFR Part 61, Subpart EEEE; and 40 CFR Part 60, Subpart Kb.

In addition, Nortru was unable to provide a written malfunction abatement plan (MAP) for FG-TruckTransfer, nor documentation that a MAP had been approved by AQD, as required in PTI No. 84-04B, FG-TruckTransfer, Special Condition III.3.

The facility also failed to monitor scrubber operating parameters in accordance with PTI No. 84-04C. The facility provided records which shows that the scrubber is monitored for oxidation-reduction potential and pH of the scrubbing liquid, but there were no records showing that the facility monitored the permanganate concentration twice per day to demonstrate compliance with the minimum permanganate concentration of 3%, as required in PTI No 84-04C, FG-CONTNROFFLOAD, Special Conditions IV.2 and VI.1.

The violations cited above which reference ROP No. MI-ROP-N0731-2009 represent deviations from ROP requirements. The AQD administrative rules at R 336.1213(3)(c) require the reporting of deviations not less than once every 6 months, and further require the report to be certified by the facility's responsible official for its truth, accuracy, and completeness after reasonable inquiry. The administrative rules at R 336.1213(4)(c) also require an annual certification of compliance from the facility's responsible official, excepting those deviations identified by the facility after reasonable inquiry. These requirements are incorporated into the ROP at Special Conditions VII.1 through 3 of FG-TruckTransfer and FG-ContrnOffload. Nortru failed to report any deviations of any requirements of ROP No. MI-ROP-N0731-2009 in the annual and semi-annual ROP certifications submitted by Nortru for the following reporting time periods:

- Semi-annual ROP certification covering January 1 through June 30, 2014;
- Semi-annual ROP certification covering July 1 through December 31, 2014;
- Annual ROP certification covering January 1 through December 31, 2014;
- Semi-annual ROP certification covering January 1 through June 30, 2015;
- Semi-annual ROP certification covering July 1 through December 31, 2015;
- Annual ROP certification covering January 1 through December 31, 2015;
- Semi-annual ROP certification covering January 1 through June 30, 2016.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 4, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the

Mr. Allen Jones  
Page 4  
October 14, 2016

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 Nortru 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 Nortru. 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: Ms. LaReina Wheeler, City of Detroit, BSEED  
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