



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

January 6, 2022

Mr. Christopher May, Vice President  
Albar Industries Incorporated  
780 Whitney Drive  
Lapeer, Michigan 48446

SRN: N0802, Lapeer County

Dear Mr. May:

**VIOLATION NOTICE**

On June 15, 2021, August 5, 2021 and November 23, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an observation of stack testing at Albar Industries Inc., located at 780 Whitney Drive, Lapeer, Michigan. The purpose of these observations was to determine 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-N0802-2020;

During the observations, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-COATING: Destruction Efficiency testing for the Regenerative Thermal Oxidizer (RTO)	Rule 336.1910, SC IV.4	Control device has not been properly operated and maintained.
FG-COATING: Removal Efficiency testing for the Fluidized Bed Concentrator	Rule 336.1910, SC IV.4	Control device has not been properly operated and maintained.
FG-Coating: RTO operational parameters were not available during operation of EU-LN3.	Rule 336.1912, SC IV.2, GC 25	Failure to report an RTO malfunction/abnormal condition (no temperature data) and failure to provide a 10 day follow up report.

On June 15, 2021, August 5, 2021 and November 23, 2021, the AQD staff observed operation of EU-LN3 Paint line while the fluidized bed concentrator and RTO was not operating satisfactorily. This constitutes a violation of Act 451, Rule 910, 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.

The table below shows unacceptable results received on December 22, 2021, and as tested on November 23, 2021. These test results also incorrectly include methane reduction in a manner which was specifically excluded in the EGLE AQD test plan approval letter for these tests.

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Device/Test Date	Testing 11/23/2021
Fluidized Bed – Removal Efficiency	83.4%
RTO – Destruction Efficiency	95.2%

In addition, an email received on December 12, 2021, indicated that temperature data was not available for the RTO from November 22, 2021, around noon, until the morning of November 24, 2021. This is a violation of Rule 912 as a failure to report a malfunction/abnormal condition lasting longer than 2 hours and failure to provide a follow up report within 10 days.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 27, 2022, (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.

Please submit the written response to EGLE, AQD, Lansing District, at 505 W. Allegan, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Albar Industries Inc., 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 violation cited above and for the cooperation that was extended to me during my inspection of June 15, 2021, and August 5, 2021. 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,



Robert Byrnes  
Senior Environmental Engineer  
Air Quality Division  
517-275-0439

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Brad Myott, EGLE