



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 11, 2019

Mr. Mike Brewers
Mercury Displacement Industries, Inc.
P.O. Box 710 - US 12 East
Edwardsburg, Michigan 49112

SRN: N5886, Cass County

Dear Mr. Brewers:

VIOLATION NOTICE

On January 10, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), observed stack testing at Mercury Displacement Industries, Inc. located at 25028 US 12 East, Edwardsburg, Michigan. We received the test report with emission results on January 23, 2019. The emission testing was performed January 10-11, 2019 to determine 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 50-18.

During the stack testing, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-MDI	PTI. No 50-18, Special Condition I.3, SV-WELDROOM-01	Mercury emission limit is 150,000 nanograms (ng)/meter cubed (m3). The average tested rate on January 10, 2019 was 428,000 ng/m3.
FG-MDI	PTI No 50-18, Special Condition I.6, SV-CURINGOVENS-02	Mercury emission limit is 988 ng/m3. The average tested rate on January 10, 2019 was 2,620 ng/m3. The average tested rate on January 11, 2019 was 2,153 ng/m3.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 4, 2019 (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.

Please submit the written response to the DEQ, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Mercury Displacement 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 violations cited above and for the cooperation that was extended to me during my observation of stack testing at the 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,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
269-910-2109

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Rex Lane, DEQ