

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY



SRN: N7359, Wayne County

DETROIT DISTRICT OFFICE

October 28, 2022

Robert Slater, CEO Aevitas Specialty Services Corporation 663 Lycaste St. Detroit, MI 48214

Dear Robert Slater:

VIOLATION NOTICE

On October 20, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), investigated complaints of nuisance odors alleged to be the result of operations at Aevitas Specialty Services Corporation (Aevitas), located at 663 Lycaste St., Detroit, Michigan. The purpose of this investigation was to determine Aevitas' 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 10-12.

The investigation was performed by Jonathan Lamb of the AQD from approximately 1:15 PM to 2:45 PM on October 20, 2022. During the investigation, the following violation was observed:

Process Description	Rule/Permit Condition Violated	Comments
FG-ProcessTanks	R 336.1901(b)	Persistent and objectionable odors of moderate to strong
	PTI No. 10-12; General Condition 6	intensity (Level 3), attributable to Aevitas' operations, impacting residential areas downwind of the facility.

R 336.1901(b) states, in part:

"A person shall not cause or permit the emission of an air contaminant in quantities that cause injurious effects to human health and property, or the unreasonable interference with the comfortable enjoyment of life and property."

During the investigation performed on October 20, 2022, AQD staff observed persistent and objectionable odors of moderate to strong intensity (Level 3) impacting areas downwind of Aevitas. AQD staff determined the source of the odors to be Aevitas. In AQD staff's professional judgment, the odors observed were of sufficient intensity and

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duration so as to constitute a violation of R 336.1901(b) and General Condition 6 of PTI No. 10-12.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 18, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the date the violation occurred; an explanation of the cause 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 the EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Aevitas believes the above observations or statements are inaccurate or do not constitute a violation 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. 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,

Jonathan Lamb

Senior Environmental Quality Analyst

Air Quality Division

313-348-2527

cc: Hosam Hassanien, City of Detroit BSEED
Crystal Rogers, City of Detroit BSEED
Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE
Steve Weis, EGLE