



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 16, 2020

Mr. Brian Miller
Environmental Specialist
ZF Axle Drives Marysville, LLC
2900 Busha Highway
Marysville, MI 48040

SRN: N7795, Saint Clair County

Dear Mr. Miller:

VIOLATION NOTICE

On July 30, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of ZF Axle Drives Marysville, LLC located at 2900 Busha Highway, Marysville, Michigan. The purpose of this inspection was to determine ZF Axle Drives Marysville, LLC'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 147-07C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-AMMONIA	PTI 147-07C, IV.3.	The permittee failed to install water traps of 55 gallons minimum size on the ammonia storage tank vent, and the vent lines of five ammonia regulators.

During this inspection, it was determined that the permittee failed to install water traps of 55 gallons minimum size on the ammonia storage tank vent, and on the vent lines of five ammonia regulators. This appears to be a violation of EU-AMMONIA Special Condition IV.3, which states, "Any vapor or liquid line, exclusive of couplings, requiring venting after ammonia transfer shall be vented through a water trap of 55 gallons minimum size. Safety water shall not be used for this purpose."

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 7, 2020 (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

Mr. Brian Miller
ZF Axle Drives Marysville, LLC
Page 2
September 16, 2020

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, Warren District, at 27700 Donald Court, Warren, Michigan 48092, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If ZF Axle Drives Marysville, LLC 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 July 30, 2020. 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 Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

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