

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY GAYLORD FIELD OFFICE



SRN: N7868, Alpena County

May 12, 2016

Mr. Troy Molby Jordan Development Company, L.L.C. 1503 Garfield Road North Traverse City, MI 49686

Dear Mr. Molby:

VIOLATION NOTICE

On May 11, 2016, staff from the Department of Environmental Quality (DEQ), Air Quality Division (AQD), reviewed records related to Jordan Development Company, L.L.C.'s (Jordan) Slam Duncan facility located in Green Township, Alpena County, Michigan. The purpose of the record review 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), and the administrative rules; and to determine compliance with the conditions of Permit to Install (PTI) number 312-07 and the associated Malfunction Abatement Plan (MAP).

During the record review, AQD staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
Process Description	Condition violated	Comments
EUENGINE1	Rule 911,	Daily records of the
	Permit condition 2.2,	catalyst inlet and outlet
		temperatures are
		unavailable.

PTI number 312-07 Special Condition number 2.2 requires operating EUENGINE1 per the implementation of the MAP (enclosed). Table 2 and Appendix B of the MAP require daily monitoring and recordkeeping of the catalyst inlet and outlet temperatures. During the records review, Jordan was unable to produce records of the daily catalyst inlet and outlet temperatures from EUENGINE1. This is a violation of Special Condition number 2.2 of PTI number 312-07.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 1, 2016 (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.

If Jordan believes the above observations or statements are inaccurate or do not constitute violation of the applicable legal requirement 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 review. Additionally, it may be prudent for Jordan to review your other AQD permits and confirm all monitoring and recordkeeping are being completed in accordance with your permit conditions.

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, Horia Fredly

Gloria Torello

Environmental Quality Analyst

Air Quality Division

989-705-3410

Enclosure

cc: Ms. Janis Ransom, DEQ

cc/encs/via e-mail: Ms. Kim Weber, Jordan Development Company, L.L.C.

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ Ms. Heidi Hollenbach, DEQ Mr. Thomas Hess. DEQ