

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY



C. HEIDI GRETHER DIRECTOR

SRN: P0107, Washtenaw County

JACKSON DISTRICT OFFICE

November 29, 2018

<u>CERTIFIED MAIL - 7017 3380 0000 4105 8964</u> <u>RETURN RECEIPT</u>

Mr. Brant Shimko Condat Corporation 250 S. Industrial Dr. Saline, Michigan 48176

Dear Mr. Shimko:

VIOLATION NOTICE

On November 16, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Condat Corporation (Company) located at 250 S. Industrial Drive, Saline Michigan. The purpose of this inspection was to determine the Company'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) and the associated Air Pollution Control Rules.

During the inspection, AQD staff observed the following:

| | Rule/Permit | |
|---|--------------------------------------|---|
| Process Description | Condition Violated | Comments |
| Four chemical mixers controlled by two cyclones and a baghouse. | Rule 201-No Permit to Install (PTI). | The Company failed to adequately demonstrate that this emission unit is exempt from PTI requirements per either Rule 290 or Rule 291. Pollutants of concerns include acetaldehyde, ethylbenzene, acrolein and formaldehyde. |
| Two chemical process lines controlled by a baghouse. | Rule 201-No PTI. | The Company failed to adequately demonstrate that this emission unit is exempt from PTI requirements per either Rule 290 or Rule 291. Pollutants of concerns include acetaldehyde, ethylbenzene, acrolein and formaldehyde. |

During this inspection, it was noted that the Company had installed and commenced operation of unpermitted processes at this facility. The AQD staff advised the Company on 11/16/2018 that this could be a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the mixers and associated process lines. An application form is available by request, or at the following website:

http://www.deg.state.mi.us/aps/nsr_information.shtml

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 20, 2018. 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 violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit written response to the DEQ, AQD Jackson District, at 301 East Louis B. Glick Highway, Jackson, Michigan 49201 and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company 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 inspection of this Company. 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,

Mike Kovalchick

Senior Environmental Engineer

Mike Kovalchich

Air Quality Division

517-416-5025

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ

Mr. Jay Olaguer, DEQ Mr. Chris Ethridge, DEQ Ms. Jenine Camilleri, DEQ