



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

June 28, 2016

Mr. Jason Siemen
Speedway LLC
500 Speedway Drive
Enon, Ohio 45323

SRN: P0714, Oakland County

Dear Mr. Siemen:

VIOLATION NOTICE

On June 21, 2016, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), conducted an inspection of Speedway LLC #8821 (Speedway), located at 547 North Perry Street, Pontiac, Michigan. The purpose of this inspection was to determine Speedway'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 administrative rules.

During the inspection, staff of the AQD observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---|--------------------------------|--|
| Soil vapor extraction and air stripping remediation processes | Rule 201 | The remediation system was installed on May 2, 2016, before obtaining a Permit to Install. |

During this inspection, it was noted that Speedway had installed and commenced operation of an unpermitted process. This is a violation of Rule 201 of Act 451.

A program for compliance may include a completed Permit to Install application for the soil vapor extraction and air stripping process equipment. An application form is available by request, or at the following website: http://www.deq.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.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 19, 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 Speedway 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 Speedway. If you have any questions regarding the violation or the actions necessary to bring Speedway into compliance, please contact me at the telephone number listed below.

Sincerely,

Mary A. Liveson for
Sam Liveson
Environmental Engineer
Air Quality Division
586-753-3749
livesons1@michigan.gov

cc: Mr. Michael Cox, Practical Environmental Consultants, Inc.
Ms. Lynn Fiedler, MDEQ
Ms. Teresa Seidel, MDEQ
Ms. Heidi Hollenbach, MDEQ
Mr. Thomas Hess, MDEQ
Mr. Christopher Ethridge, MDEQ