



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



KEITH CREAUGH
DIRECTOR

March 18, 2016

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Bob Bailey
Phoenix Polymer Compounding LLC
7290 Kensington Road
Brighton, Michigan 48116

SRN: U471509357, Livingston County

Dear Mr. Bailey:

VIOLATION NOTICE

On August 27, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Phoenix Polymer Compounding LLC located at 7290 Kensington Road, Brighton. The purpose of this inspection 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); the administrative rules and to investigate past complaints which we received on and prior to August 28, 2014, regarding foul odors believed to be attributed to your facility.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Barnstead Thermolyne oven used to bake/burn plastic	R336.1201	Process installed without a permit to install.

During this inspection, it was noted that Phoenix Polymer Compounding had installed and operates an oven used to burn off plastic samples for the purpose of determining plastic product filler content at this facility. The smoke produced by the burning of plastic is vented through the northwest side of the building by use of a ventilation fan. On the date of inspection, the AQD staff informed the facility that unless a specific permit exemption applied to the oven a permit to install would be required. As of this date an acceptable DEQ, AQD Part 2 Rules exemption has not been identified by the facility. As discussed with you on March 16, 2016, the unpermitted equipment constitutes a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the plastic bake off oven process equipment. An application form is available by request, or at the following website:

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

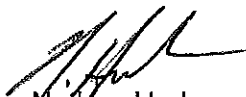
Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 8, 2016. The written response should include: the duration the violation occurred (the oven has been operated in this manner); 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 Phoenix Polymer Compounding 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 Phoenix Polymer Compounding. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Nathan Hude
Environmental Quality Analyst
Air Quality Division
517-284-6779

NNH:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ