



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



LIESL EICHLER CLARK  
DIRECTOR

September 13, 2022

VIA E-MAIL

James Martin  
Environmental, Health and Safety Manager  
Guardian Industries, LLC  
14600 Romine Road  
Carleton, Michigan 48177

SRN: B1877; Monroe County

Dear James:

**VIOLATION NOTICE**

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) has reviewed the 2022 Second Quarter Excess Emissions and Monitoring Systems Performance reports submitted by Guardian Industries, LLC located at 14600 Romine Road in Carleton. The Renewable Operating Permit MI-ROP-B1877-2021b requires the facility to monitor and record nitrogen oxides (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) emissions, and gaseous flow from EU00079 (Line #1 Furnace) with a continuous emissions monitoring system (CEMs) that is installed, calibrated, operated, and maintained in accordance with Title 40 of the Code of Federal Regulations (40 CFR), Part 60, Appendix F.

During the report review, staff determined the following:

| Process Description       | Rule/Permit Condition Violated                                     | Comments   |
|---------------------------|--|--|
| EU00079 (Line #1 Furnace) | MI-ROP-B1877-2021b, EU00079, SC IV.5, VI.1, VI.2, Appendix 3, SC 4 | Failure to perform required quarterly quality assurance (QA) for 2022 Second Quarter |

The 2022 second quarter excess emissions and monitoring system performance report were received on July 28, 2022. During report review, the AQD evaluated 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; the Air Pollution Control Rules; and the conditions of ROP MI-ROP-B1877-2021b.

The 2022 second quarter excess emissions and monitoring system performance reports indicate that the required quarterly quality assurance cylinder gas audit (CGA) was not completed during the reporting period of April 1, 2022 – June 30, 2022. The report indicates that EU00079 operated during the 2022 second quarter.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 4, 2022 (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.

Please submit the written response to the following locations:

Lindsey Wells  
Technical Programs Unit  
EGLE, Air Quality Division  
Constitution Hall, 2<sup>nd</sup> Floor South  
525 West Allegan Street  
Lansing, Michigan 48933

Jenine Camilleri  
Enforcement Unit Supervisor  
EGLE, Air Quality Division  
Constitution Hall, 2<sup>nd</sup> Floor South  
525 West Allegan Street  
Lansing, Michigan 48933

If Guardian Industries 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. 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,



Lindsey Wells  
Environmental Quality Analyst  
Air Quality Division  
517-282-2345

cc: Ben Kroeger, Guardian Industries  
Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jeremy Howe, EGLE  
Scott Miller, EGLE  
Brian Carley, EGLE  
Jenine Camilleri, EGLE