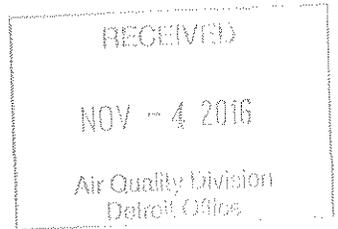




9300 Dix Avenue, Dearborn, Michigan 48120, (313) 843-7200



November 2, 2016

Katie Koster
MDEQ Detroit, AQD
Cadillac Place
3058 W. Grand Blvd., Suite 2-300
Detroit, MI 48202-6058

**Subject: October 21, 2016, Violation Notice
 Edw. C. Levy Co., Plant 3
 SRN: B4364, Wayne County**

Dear Ms. Koster:

This letter is in response to your Violation Notice (VN), dated October 21, 2016, for the Edw. C. Levy Co. (Levy), Plant 3, located at 100 Westfield Road, Ecorse, Michigan. The VN alleged failure to clean paved roads daily with a power flush truck, weather permitting & failure to submit a quarterly report identifying each day in which an operational requirement was not met.

Plant 3 had an unplanned change in management during the first quarter of 2016. The new plant manager inspected the paved roads daily (Monday – Friday) and cleaned the paved roads with a power flush truck as needed, weather permitting. The new manager misunderstood the requirement to clean the paved roads regardless of need. The new plant manager and his team are now trained on the requirement to clean the paved roads daily regardless of the need, Monday – Friday weather permitting.

Included with this submission are three quarterly deviation reports (1st, 2nd, 3rd quarters 2016) addressing the 21 total days of failure to clean the paved roads daily with a power flush truck. For the record, the paved roads were inspected on all 21 days and were determined to be clean and not requiring further cleaning. These inspections are documented environmental records.

Please let me know if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas A. Smith".

Thomas A. Smith
General Operations Manager

Cc/via email: Gerald Williams, Operations Manager, Levy
Edward Patino, Area Manager, Levy
Brian Lasley, Vice President, Levy

Attachments: 1st Quarter 2016 Deviation Report
2nd Quarter 2016 Deviation Report
3rd Quarter 2016 Deviation Report
Quarterly Deviation Report Certification Form



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

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Air Quality Division
Detroit Office

RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Edw. C. Levy Co. Plant 3 County Wayne

Source Address 100 Westfield City Ecorse

AQD Source ID (SRN) B4364 ROP No. MI-ROP-B4364-2015 ROP Section No. _____

Please check the appropriate box(es):

Annual Compliance Certification (Pursuant to Rule 213(4)(c))

Reporting period (provide inclusive dates): From _____ To _____

- 1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
- 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From _____ To _____

- 1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
- 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

Other Report Certification

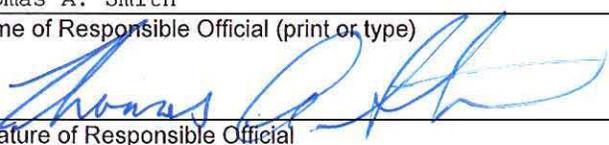
Reporting period (provide inclusive dates): From 1/1/2016 To 9/30/2016

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Quarterly Deviation Report Form

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Thomas A. Smith General Operations Manager (313) 429-2200
Name of Responsible Official (print or type) Title Phone Number


Signature of Responsible Official

11/3/16
Date

* Photocopy this form as needed.



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

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NOV - 4 2016
Air Quality Division
Detroit Office

**RENEWABLE OPERATING PERMIT
DEVIATION REPORT**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating Permit (ROP) for which deviations required to be reported by R 336.1213 (Rule 213) subrule (3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Edw. C. Levy Co. Plant 3 County Wayne

Source Address 100 Westfield City Ecorse

AQD Source ID (SRN) B4364 ROP No. MI-ROP-B4364-2015 ROP Section No. _____

ROP Section Contact _____ Contact Phone No. 313-429-2200

Reporting Period (provide inclusive dates): From 1/1/2016 to 3/31/2016

Report Type: Annual Semi Annual Other (Describe) Quarterly Deviation Report

1. Group or Source Wide ID Levy Plant 3 Roads	2. Condition No. III.3.C.1	3. Date(s) of Occurrence Multiple	4. Previously reported? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation NA
6. Method Used to Determine Compliance Status (if different from method specified in ROP) Daily Recordkeeping - paper and electronic		7. Description of Deviation Failure to clean paved roads on a daily basis		
8. Reason for Deviation and Description of Corrective Action Taken Roads were not cleaned on days when they were inspected and determined to already be clean. The site has an effective program for daily inspecting and cleaning all roadways.				

1. Group or Source Wide ID	2. Condition No.	3. Date(s) of Occurrence	4. Previously reported? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date	5. Duration of Deviation
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation		
8. Reason for Deviation and Description of Corrective Action Taken				

1. Group or Source Wide ID	2. Condition No.	3. Date(s) of Occurrence	4. Previously reported? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date	5. Duration of Deviation
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation		
8. Reason for Deviation and Description of Corrective Action Taken				



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Source Name Edw. C. Levy Co. Plant 3 County Wayne

Source Address 100 Westfield City Ecorse

AQD Source ID (SRN) B4364 ROP No. MI-ROP-B4364-2015 ROP Section No. _____

ROP Section Contact _____ Contact Phone No. 313-429-2200

Reporting Period (provide inclusive dates): From 4/1/2016 to 6/30/2016

Report Type: Annual Semi Annual Other (Describe) Quarterly Deviation Report

1. Group or Source Wide ID Levy Plant 3 Roads	2. Condition No. III.3.C.1	3. Date(s) of Occurrence Multiple	4. Previously reported? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation NA
6. Method Used to Determine Compliance Status (if different from method specified in ROP) Daily Recordkeeping - paper and electronic		7. Description of Deviation Failure to clean paved roads on a daily basis		
8. Reason for Deviation and Description of Corrective Action Taken Roads were not cleaned on days when they were inspected and determined to already be clean. The site has an effective program for daily inspecting and cleaning all roadways.				

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6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation		
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6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation		
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**RENEWABLE OPERATING PERMIT
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Source Name Edw. C. Levy Co. Plant 3 County Wayne

Source Address 100 Westfield City Ecorse

AQD Source ID (SRN) B4364 ROP No. MI-ROP-B4364-2015 ROP Section No. _____

ROP Section Contact _____ Contact Phone No. 313-429-2200

Reporting Period (provide inclusive dates): From 7/1/2016 to 9/30/2014

Report Type: Annual Semi Annual Other (Describe) Quarterly Deviation Report

1. Group or Source Wide ID Levy Plant 3 Roads	2. Condition No. III.3.C.1	3. Date(s) of Occurrence Multiple	4. Previously reported? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date Quarter 1 & 2 2016	5. Duration of Deviation NA
6. Method Used to Determine Compliance Status (if different from method specified in ROP) Daily Recordkeeping - paper and electronic		7. Description of Deviation Failure to clean paved roads on a daily basis		
8. Reason for Deviation and Description of Corrective Action Taken Roads were not cleaned on days when they were inspected and determined to already be clean. The site has an effective program for daily inspecting and cleaning all roadways.				

1. Group or Source Wide ID	2. Condition No.	3. Date(s) of Occurrence	4. Previously reported? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date	5. Duration of Deviation
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6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation		
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