



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
DETROIT DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

March 3, 2021

Mr. Rick Sauve, Compliance Specialist  
Republic Industrial and Energy Solutions, LLC  
28470 Citrin Drive  
Romulus, MI 48174

SRN: M4796, Wayne County

Dear Mr. Sauve:

**VIOLATION NOTICE**

On January 21, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Republic Industrial and Energy Solutions, LLC, located at 28470 Citrin Dr., Romulus, Michigan. The purpose of this inspection was to determine Republic Industrial and Energy Solutions, LLC'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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 539-97F.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Carbon adsorption system for FGTANKS	PTI No. 539-97F, FGTANKS, Special Condition IV.3	Carbon adsorption system was not equipped with a saturation indicator capable of detecting breakthrough of the carbon.

The conditions of PTI number 539-97F require that “the permittee shall equip and maintain each of the carbon adsorption systems for FGTANKS with a saturation indicator capable of detecting breakthrough of the carbon.” During the inspection performed on January 21, 2021, AQD staff observed that the carbon adsorption system was not equipped with a saturation indicator.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 24, 2021 (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

Mr. Rick Sauve  
Republic Industrial and Energy Solutions, LLC  
Page 2  
March 3, 2021

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 EGLE, AQD, Detroit District, at 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Republic Industrial and Energy Solutions, LLC 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 Republic Industrial and Energy Solutions, LLC. 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,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-348-2527

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Dr. April Wendling, EGLE  
Mr. Jeff Korniski, EGLE