



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

September 3, 2015

Mr. Don Tate  
 President  
 REX Performance Products  
 2700 Wills Street  
 Marysville, Michigan 48040

SRN: N6944, St. Clair County

Dear Mr. Tate:

**VIOLATION NOTICE**

On August 31, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of REX Performance Products located at 2700 Wills Street, Marysville, Michigan. The purpose of this inspection was to determine REX Performance Products' 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 ruled, the conditions of Renewable Operating Permit (ROP) number MI-ROP-N6944-2011b and Consent Order AQD number AQD No. 21-2010.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	MI-ROP-N6944-2011b, SC IV.2	The facility failed to maintain and operate the non-fugitive enclosure while FGFACILITY is operating. The vent fan above the south exhaust was operating at the time of the inspection. This fan exhausted emissions to atmosphere causing the air flow out of the building and bypassing the compliance assurance monitor (CAMS).
FGFACILITY	MI-ROP-N6944-2011b, SC IV.3	The CAMS was not monitoring or recording the volatile organic compound (VOC) emissions while FG FACILITY was operating.

The cited Special Condition numbers FGFACILITY, SC IV 2 and SC IV.3 of ROP number MI-ROP-N6944-2011b are also enforceable as paragraph 9B of Consent Order, AQD number 21-2010.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **September 24, 2015**. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

As part of the written response to this Violation Notice, please update and submit a copy of the facility's updated Malfunction Abatement/Preventive Maintenance Plan which addresses the frequent malfunctions of the CAMS to District Supervisor, DEQ-Southeast Michigan District Office, Air Quality Division.

If REX Performance Products 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 violations cited above and for the cooperation that was extended to me during my inspection of August 31, 2015. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Sebastian G. Kallumkal  
Senior Environmental Engineer  
Air Quality Division  
586-753-3738

SGK/DAC

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Barbara Rosenbaum, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ