



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



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

December 23, 2019

Mr. Mike Collins
 Penske Logistics
 15520 Wayne Road
 Romulus, Michigan 48174

SRN: P1092, Wayne County

Dear Mr. Collins:

VIOLATION NOTICE

On November 15, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Penske Logistics located at 15520 Wayne Road, Romulus, Michigan. The purpose of this inspection was to determine Penske Logistics' 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); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Anhydrous Ammonia System	R 336.1201(1)	Installation of an anhydrous ammonia refrigeration system without obtaining a permit to install.

During this inspection, it was noted that Penske Logistics had installed and commenced operation of an anhydrous ammonia refrigeration system at this facility. The AQD staff advised Penske Logistics on November 15, 2019, that this is a violation of R 336.1201(1) of the administrative rules promulgated under Act 451. The capacity of the system is 36,000 pounds (approximately 7,200 gallons) and exceeds the 500 gallons limit specified within the permit to install (PTI) exemption under R 336.1280(2)(a).

A program for compliance may include a completed PTI application for the anhydrous ammonia refrigeration system equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that R 336.1201(1) 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.

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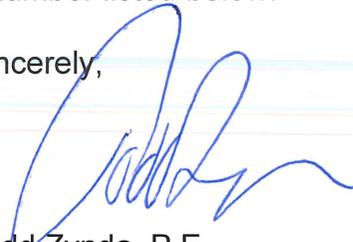
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 13, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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 recurrence.

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 Penske Logistics 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 Penske Logistics. 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,



Todd Zynda, P.E.
Senior Environmental Engineer
Air Quality Division
313-456-2761

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