



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 26, 2023

Jay Brown, Associate Director, Environmental Health and Safety
Piramal Pharma Solutions
18665 Krause St.
Riverview, MI 48193

SRN: N7519, Wayne County

Dear Jay Brown:

VIOLATION NOTICE

On May 31, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Ash Stevens, LLC located at 18665 Krause St., Riverview, Michigan. The purpose of this inspection was to determine Ash Stevens, 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 31-12B.

During the inspection, staff observed the following violations:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--|---|
| FG-MfgAPIs | PTI No. 31-12B, FG-MfgAPIs, S.C. VI.1 through 6. | Facility failed to provide required material usage and emission calculations for the time period January through April, 2023. |
| FGFACILITY | PTI No. 31-12B, FGFACILITY, S.C. VI 2 a. and b. | Facility failed to provide required material usage and emission calculations for the time period January through April, 2023. |

During the inspection, the facility was unable to provide emission calculations and material usage records for the time period January through April 2023. This is a violation of the recordkeeping requirements specified in Special Condition FG-MfgAPIs, VI.1 through 6 and FGFACILITY VI. 2 a. and b. of PTI number 31-12B.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 16, 2023 (which coincides with 21

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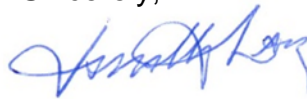
calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Jonathan Lamb at EGLE, AQD, Detroit District, at 3058 West Grand Blvd., Suite 2-300, Detroit, Michigan 48202 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ash Stevens, 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 violations cited above and for the cooperation that was extended to me during my inspection of Ash Stevens, LLC. 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,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-348-2527
lambj1@michigan.gov

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Dr. April Wendling, EGLE
Jeff Korniski, EGLE