



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

March 19, 2024

VIA EMAIL ONLY

Jon Strauchman, Owner  
Dustin Hurd, Plant Manager  
Bulk Guys, LLC  
2530 Vicksburg Street  
Marysville, Michigan 48040

SRN: P1383, St. Clair County

Dear Jon Strauchman and Dustin Hurd:

**SECOND VIOLATION NOTICE**

On June 20, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Bulk Guys LLC, located at 2530 Vicksburg Street, Marysville, Michigan. The purpose of the inspection was to determine Bulk Guys LLC's compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and to investigate the high opacity visible emissions related to the facility's operations.

On June 26, 2023, the AQD sent Bulk Guys LLC a Violation Notice citing violations discovered as a result of the inspection and requested your written response by July 17, 2023. A copy of that letter is enclosed for your reference. AQD received a response to this violation notice on July 19, 2023; however, the response did not contain the necessary information to resolve the violations. Specifically, the response did not include the dates the violation occurred (i.e. how long has this equipment been installed) and did not include a timeline by which a permit to install (PTI) will be submitted to AQD for the sand roasting equipment.

In the response to the June 26, 2023, Violation Notice, Bulk Guys LLC stated that they believe the natural gas fired sand roasters are exempt from the requirement to obtain a permit to install per exemption Rule 282(2)(a). Following the response, AQD staff informed Bulk Guys LLC, that the natural gas burning portion of the process that provides indirect heat to the sand roasters may be exempt from PTI per Rule 282(2)(b), however, Rule 282(2)(b) does not exempt the particulate emissions (sand) generated from the sand roasting process.

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During an on-site inspection of Bulk Guys LLC on September 13, 2023, AQD advised Bulk Guys LLC to submit a PTI application for the sand roasting process no later than November 30, 2023. AQD did not receive a PTI application by that date. During another on-site inspection of Bulk Guys LLC on December 19, 2023, AQD extended the deadline for the PTI application to January 30, 2024. AQD did not receive a PTI application by that date. On January 31, 2024, Bulk Guys LLC contacted AQD and requested an extension on submitting the permit to install application. AQD extended the submittal due date for the PTI application to February 29, 2024. AQD did not receive a PTI application by this date.

Bulk Guys LLC's response to the June 26, 2023, violation also states that the sand screeners are exempt from the requirement to obtain a PTI per exemption Rule 285(2)(t). AQD agrees with this assessment. The sand screeners are exempt from the requirement to obtain a PTI per Rule 285(2)(t).

Please be advised that failure to respond in writing and identifying actions Bulk Guys LLC will take or has taken to resolve the cited violations may result in escalated enforcement action by the AQD. Please provide the information requested in our June 26, 2023, letter by March 26, 2024, which corresponds to 7 days from the date of this letter.

Please submit the written response to Adam Bognar at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or [BognarA1@Michigan.gov](mailto:BognarA1@Michigan.gov) and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring Bulk Guys LLC into compliance, please contact me at the number listed below.

Sincerely,



Adam Bognar  
Senior Environmental Engineer  
Air Quality Division  
586-854-1517

Enclosure

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cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Kerry Kelly, EGLE