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112(r)/Air Enforcement: U.S. Environmental Protection Agency and Reese, Michigan Facility Enter into Expedited Settlement Agreement

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The United States Environmental Protection Agency ("EPA") and Advanced Micronutrient Products, Inc. ("AMP") entered into a March 16th Expedited Settlement Agreement ("ESA") for alleged violations of Section 112(r) of the Clean Air Act. See CAA-05-2017-0015.

The ESA states that EPA conducted a compliance inspection of AMP's facility in Reese, Michigan on July 13, 2016.

The purpose of the compliance inspection was to determine the facility's compliance with Section 112(r) of the Clean Air Act and the regulations promulgated at 40 C.F.R. Part 68. From the documents obtained by the July 13th inspection and documents obtained from AMP, EPA allegedly identified violation of the following regulations:

- Failure to establish a system to promptly address the Process Hazard Analysis team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete action as soon as possible, and develop a written schedule when these actions are to be completed (citing 40 C.F.R. § 68.67(e))
- Failure to promptly determine and document an appropriate response to each of the findings of the compliance audit (citing 40 C.F.R. § 68.79(v))

AMP agrees to a civil penalty of \$1,800.

[A copy of the ESA can be downloaded here.](#)