



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

July 3, 2019

Mr. Tom O'Malley  
Kassouni Manufacturing, Inc.  
815 South Front Street  
Belding, Michigan 48809

SRN: A1702, Ionia County

Dear Mr. O'Malley:

**VIOLATION NOTICE**

On June 25, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Kassouni Manufacturing, Inc located at 815 South Front Street, Belding, Michigan. The purpose of this inspection was to determine Kassouni Manufacturing, Inc'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; the conditions of Permit to Install (PTI) number 364-07; and to investigate a recent chlorine gas release that occurred on June 22, 2019 associated with Kassouni Manufacturing, Inc's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Tableting Process Area	Rule 370(1)	Failure to properly collect and dispose of an air contaminant

On June 22, 2019, a chlorine gas release occurred due to the chemical reaction of trichloroisocyanuric acid sweepings with water. The improper collection and disposal of these particulate sweepings constitutes a violation of Rule 370. Rule 370 requires that an air contaminant (i.e., the sweepings) be collected and disposed of in a manner to minimize the introduction of contaminants to the outer air.

The AQD is requesting that Kassouni Manufacturing, Inc. take **immediate action** to properly store, collect, contain, and dispose of the trichloroisocyanuric acid powder to avoid any contact with water in the facility, and operate the facility in a manner consistent with safety and good air pollution control practices for minimizing emissions to prevent any negative impacts to nearby residents in the event of a chlorine gas release.

The AQD also requests that Kassouni Manufacturing, Inc. take prompt action to replace the damaged roof in accordance with the timeframe set forth by the Ionia County Building Inspector.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 24, 2019 (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 reoccurrence.

In addition, AQD also requests that Kassouni Manufacturing, Inc. submit the specifications for the baghouse collection systems, as already requested, and a Malfunction Abatement / Preventative Maintenance Plan for all equipment associated with the trichloroisocyanuric acid tablet manufacturing process be included with the written response.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Kassouni Manufacturing, Inc 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 Kassouni Manufacturing, Inc. 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,



Kaitlyn DeVries  
Environmental Quality Analyst  
Air Quality Division  
616-558-0552

cc: Chief Gregg Moore, Belding Fire Department  
Mr. Jim Seibel, Ionia County  
Mr. Brian Kelly, EPA  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE  
Mr. David Bandlow, EGLE