



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 1, 2022

Ryan Lowe  
IACNA Mendon, LLC  
236 West Clark Street  
Mendon, Michigan 49072

SRN: A6352, St. Joseph County

Dear Ryan Lowe:

**VIOLATION NOTICE**

On July 14, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of IACNA Mendon, LLC located at 236 West Clark Street, Mendon, Michigan. The purpose of this inspection was to determine IACNA Mendon, LLC 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 133-05A;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	Special Condition VI.2	Facility was unable to provide Individual and aggregate HAP emission calculations determining the monthly and annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.
FGFACILITY	Special Condition VI.3	Facility was unable to provide VOC emission calculations determining the monthly and annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

Vac form line "483", Vac form line "482"	Rule 201	Facility was unable to provide records to show compliance with Rule 290 exemption.
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During this inspection, it was noted that IACNA Mendon, LLC had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised IACNA Mendon, LLC on July 14, 2022, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the Vac form line "483" and Vac Form Line "482" process equipment. An application form is available by request, or at the following website: [www.michigan.gov/air](http://www.michigan.gov/air).

Be advised that Rule 201 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 22, 2022 (which coincides with 21 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 EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If IACNA Mendon, 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.

Ryan Lowe  
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of IACNA, Mendon, 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,

A handwritten signature in black ink, appearing to read 'Chance Collins', with a long horizontal flourish extending to the right.

Chance Collins  
Environmental Quality Analyst  
Air Quality Division  
269-254-7119

cc: Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Rex Lane, EGLE