

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY KALAMAZOO DISTRICT OFFICE



April 2, 2015

Mr. Allen Jeske HECO, Inc. 3509 South Burdick Street Kalamazoo, Michigan 49001

SRN: B1692, Kalamazoo County

Dear Mr. Jeske:

VIOLATION NOTICE

On March 30, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of HECO, Inc. (Facility), located at 3509 South Burdick Street, Kalamazoo, Michigan. The purpose of this inspection was to determine the Facility'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 administrative rules: and the conditions of Permit to Install (PTI) Nos. 188-93, 247-77, and 168-13.

During the inspection, staff of the AQD observed the following:

	Rule/Permit	
Process Description	Condition Violated	Comments
EUBurnOff - medium	PTI No. 168-13, Condition VI.2	The Facility has not recorded the afterburner temperature since mid-December 2014
EUBurnOff - medium	PTI No. 168-13, Condition VI.5	The Facility is not keeping records of the number of batches processed in the oven to demonstrate compliance with their limit.
EUBurnOff - medium	PTI No. 168-13, Condition VI.4	The Facility does not have information on the chemical composition of all the materials burned in the oven.
EUBurnOff - medium	PTI No. 168-13, Condition VII.1	The Facility has not submitted the notification of installation for the oven.
VPI System/Cure ovens	R 336.1201 (Rule 201)	The Facility does not have records sufficient to show compliance with an exemption (either Rule 287(c) or Rule 290).

Sandblasting	R 336.1201 (Rule 201)	The unit vents outside
		without controls, which
	•	does not meet the
,		exemption in Rule
		285(l)(vi).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 23, 2015. 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.

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

Sincerely,

Dorothy Bohn

Senior Environmental Quality Analyst

Air Quality Division 269-567-3552

DB:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Ms. Teresa Seidel, DEQ

Mr. Thomas Hess, DEQ

Ms. Mary Douglas, DEQ