



GRETCHEN WHITMER  
GOVERNOR

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



AARON B. KEATLEY  
ACTING DIRECTOR

June 30, 2023

Kyle Daneff  
Padnos Manufacturing  
3495 Viaduct SW  
Grandville, Michigan 49418

SRN: B1982, Ottawa County

Dear Kyle Daneff:

**VIOLATION NOTICE**

On April 21, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Padnos Manufacturing located at 185 West 8<sup>th</sup> Street, Holland, Michigan. The purpose of this inspection was to determine Padnos Manufacturing'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; and the conditions of Permit to Install (PTI) number 365-98A and 182-80C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCORECODRYER	PTI No. 182-80C, EUCORECODRYER, Special Condition III.2	Failure to maintain Malfunction Abatement Plan.
EUBRIQUETTER	PTI No. 182-80C, EUBRIQUETTER, Special Condition III.2	Failure to maintain Malfunction Abatement Plan.
EUTURNINGSCRUSHER	PTI No. 182-80C, EUTURNINGSCRUSHER, Special Condition III.1	Failure to maintain Malfunction Abatement Plan.

Review of differential pressure records determined that the facility was frequently operating the baghouses for EUCORECODRYER, EUBRIQUETTER, and EUTURNINGSCRUSHER with differential pressures above what was specified in the facility's 2015 Malfunction Abatement Plan (MAP). The facility has indicated that this occurred because the MAP has not been updated. This is a violation of the Process/Operation restrictions specified in PTI 182-80C under EUCORECODRYER Special Condition III.2, EUBRIQUETTER Special Condition III.2, and EUTURNINGSCRUSHER Special Condition III.1.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 21, 2023 (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, Grand Rapids District Office, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Padnos Manufacturing 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 Padnos Manufacturing. 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 blue ink, appearing to read "Chris Robinson".

Chris Robinson  
Environmental Quality Analyst  
Air Quality Division  
616-286-0083

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Heidi Hollenbach, EGLE