

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

KALAMAZOO DISTRICT OFFICE



DIRECTOR

June 16, 2015

Mr. Brian McFall Thelamco, Inc. P.O. Box 456 Benton Harbor, Michigan 49022

Dear Mr. McFall:

SRN: B6608, Berrien County

VIOLATION NOTICE

On June 4, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Thelamco, Inc. (Facility), located at 1202 Territorial Road, Benton Harbor, 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) No. 597-87A.

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

Process	Rule/Permit	
Description	Condition Violated	Comments
FGLAMINATORS	Conditions I.1 and I.2 under the Emission Limits and VI.5.a under the Monitoring/ Recordkeeping of PTI No. 597-87A.	The Facility was not keeping volatile organic compound (VOC) monthly emission records in a 12-month rolling format and were not calculating emissions by calendar day. Also, the Facility has not been tracking usage and emissions in their purge and cleanup solvent operations (waste and/or reclaimed).
FGFACILITY	Conditions I.1, I.2, and I.3 under the Emission Limits of PTI No. 597-87A.	The Facility was not tracking hazardous air pollutant (HAP) emissions in a 12-month rolling format.
FGFACILITY	Condition VI.2 under Monitoring/Recordkeeping of PTI No. 597-87A	The Facility has not been tracking usage and emissions from any HAP solvents used in their purge and cleanup solvent operations (waste and/or reclaimed).
FGFACILITY	Condition VI.3 under Monitoring/Recordkeeping of PTI No. 597-87A	The Facility has not been tracking usage and emissions from all VOC solvents used in their purge and clean-up solvent operations (waste and/or reclaimed).

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 10, 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,

Matt Deskins Environmental Quality Analyst Air Quality Division 269-567-3542

MD:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Ms. Teresa Seidel, DEQ

Mr. Thomas Hess, DEQ

Ms. Mary Douglas, DEQ