

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

July 12, 2017

Mr. Rob Bachholzky General Formulations 309 South Union P.O. Box 158 Sparta, Michigan 49345

SRN: M3554, Kent County

Dear Mr. Bachholzky:

VIOLATION NOTICE

On April 26, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of General Formulations located at 309 South Union, Sparta, Michigan. The purpose of this inspection was to determine General Formulation'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 192-03F.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-CoaterE	PTI No. 192-03F, Special Conditions (SC) VI.3.b-d	Incomplete records
EU-CoaterF	PTI No. 192-03F, SC VI.3.b-d	Incomplete records
FG-SolventBased	PTI No. 192-03F, SC VI.3.d-g and SC VI.4.d-f	Incomplete records
FG-Facility	PTI No. 192-03F, SC VI.2.c- e, and SC VI.3.c-e	Incomplete records

General Formulations was unable to provide the following records:

EU-CoaterE

- VOC contents for each coating material
- VOC monthly and 12-month rolling time period emissions

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EU-CoaterF

- VOC contents for each coating material
- · VOC monthly and 12-month rolling time period emissions

FG-SolventBased

- VOC content for each coating material
- Daily, monthly and 12-month rolling VOC emissions
- Sum of EU-CoaterD and EU-CoaterG
 - VOC content for each coating material
 - o VOC monthly and 12-month rolling emissions

FG-Facility

- HAP content for each material used
- Individual/aggregate monthly and 12-month rolling total emissions
- VOC content for each coating material used
- VOC monthly and 12-month rolling emissions

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 2, 2017 (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.

As part of the response, an updated Preventative Maintenance/Malfunction Abatement Plan should be resubmitted to the AQD.

General Formulation's shall resubmit the appropriate records from February 2016 through February 2017 in a more acceptable format.

Additionally, General Formulation's shall provide an applicable exemption, if available, for the two printers identified during the inspection that are utilized for testing.

If General Formulations 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. Mr. Rob Bachholzky General Formulations Page 3 July 12, 2017

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of General Formulations. 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,

Adam Shaffer

Environmental Quality Analyst

Air Quality Division

616-356-0767

cc: Ms. Heidi Hollenbach, DEQ

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Chris Ethridge, DEQ Mr. Thomas Hess, DEQ