

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY

KALAMAZOO DISTRICT OFFICE



August 23, 2018

Mr. Jeff Crouse Walsworth Publishing Company 2180 Maiden Lane St. Joseph, Michigan 49085

Dear Mr. Crouse:

SRN: N1698, Berrien County

VIOLATION NOTICE

On August 16, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Walsworth Publishing Company (Facility), located at 2180 Maiden Lane, St. Joseph, 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) PTI No. 232-97F.

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

Process Description	Rule/Permit Condition Violated	Comments
Two ink jet printers	Rule 336.1201 - Permits to Install	See Comment 1 below
FGWebFed	Special Condition III.3 under this flexible group of PTI No. 232-97F	See Comment 2 below
FGFacility	Special Condition V.2 under this flexible group of PTI No. 232-97F	See Comment 3 below

Comment 1: The Facility installed two ink jet printers without first obtaining a permit or showing that they were installed using a permit exemption.

Comment 2: The Facility has yet to develop and submit for AQD review and approval a Malfunction Abatement Plan for their two control devices (RTOs).

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Comment 3: The Facility has not done any volatile organic compounds testing using Method 24 or 24A for the materials they receive and/or as applied. Back in 2014, the Facility had requested to use manufacturer's formulation data instead, but additional information that the AQD had requested was never provided. NOTE: This condition is also listed under FGWebFed, FGSheetFed, and FGInkJet.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2018. 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 the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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. Mary Ann Dolehanty, DEQ

Mr. Craig Fitzner, DEQ

Mr. Christopher Ethridge, DEQ

Ms. Jenine Camilleri, DEQ

Ms. Mary Douglas, DEQ