



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 20, 2019

Mr. Cory Kirkbride
Southern Lithoplate, Inc.
4150 Danvers Court SE
Grand Rapids, Michigan 49512

SRN: N1872, Kent County

Dear Mr. Kirkbride:

VIOLATION NOTICE

On January 9, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Southern Lithoplate, Inc. located at 4150 Danvers Court SE, Grand Rapids, Michigan. The purpose of this inspection was to determine Southern Lithoplate, Inc.'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 37-06A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Acid gas scrubber No. 3	Rule 910	Failure to properly maintain a control device
Regenerative Thermal Oxidizer	Rule 910	Failure to properly operate and maintain a control device.
Regenerative Thermal Oxidizer	Permit to Install No. 37-06A, FG-COATERS&OVENS, Special Condition (SC) IV.2	Continued to operate coating line without the control device.

On January 9, 2019, AQD staff observed operation of FG-TANKS while the scrubber inlet ductwork was leaking acid water. The Regenerative Thermal Oxidizer (RTO) has been operating while low on media, exposing the temperature probes. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Additionally, AQD learned that FG-COATERS&OVENS continued to operate on 18 days when the RTO was inoperable, which is in violation of PTI No. 37-06A, FG-COATERS&OVENS, SC IV.2.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 13, 2019 (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.

Lastly, as part of the compliance plan, please review and modify where necessary the Operation and Maintenance Plan for FG-TANKS and FG-COATERS&OVENS. Please submit the updated plan by March 1, 2019.

Please submit the written response to the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Southern Lithoplate, Inc. 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 Southern Lithoplate, Inc. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ