

RICK SNYDER GOVERNOR

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SAGINAW BAY DISTRICT OFFICE



DAN WYANT DIRECTOR

January 16, 2014

Mr. Chris Clark DGP, Inc. 3260 Fenner Street Marlette, MI 48453

SRN: N2383, Sanilac County

Dear Mr. Clark:

VIOLATION NOTICE

On January 9, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of DGP, Inc. located at 3260 Fenner, Marlette, Michigan. The purpose of this inspection was to determine DGP'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 Renewable Operating Permit (ROP) number MI-ROP-N2383-2013.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-PATTERNSHOP	VI. Monitoring/Recordkeeping Condition 3.I.	Acetone emissions are not being recorded for EU- PATTERNSHOP as required in MI-ROP- N2383-2013
EU-LAMINATION	VI. Monitoring/Recordkeeping Condition 3.1	Acetone emissions are not being recorded for EU- LAMINATION as required in MI-ROP-N2383-2013

During this inspection, DGP, Inc. was unable to produce acetone emission records for EU-PATTERNSHOP and EU-LAMINATION. Condition no. VI.3.I of MI-ROP-N2383-2013 requires acetone emission calculations determining the monthly emission rate in pounds per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. At the time of the inspection on January 9, 2014 these records were not being recorded.

This is a violation of (the recordkeeping and emission limitations) specified in Special Condition number VI.3.I of ROP number MI-ROP-N2383-2013 for EU-PATTERNSHOP and EU-LAMINATION.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 7, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If DGP, 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 violation cited above and for the cooperation that was extended to me during my inspection of DGP, Inc. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Mina h. Mclann

Gina L. McCann Environmental Quality Analyst Air Quality Division 989-894-6218

Enclosure(s) cc: Chris Hare, DEQ cc/via email: Ms. Lynn Fiedler, DEQ Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ