



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

February 3, 2017

Mr. Brian Dillon
Emerald Graphics, Inc.
4949 West Greenbrooke SE
Kentwood, Michigan 49512

SRN: N3044, Kent County

Dear Mr. Dillon:

VIOLATION NOTICE

On January 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Emerald Graphics, Inc. located at 4949 West Greenbrooke SE, Kentwood, Michigan. The purpose of this inspection was to determine Emerald Graphics, 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 Opt-out Permit to Install (PTI) No. 91-12 and General PTI No. 401-08.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-COATING	General PTI No. 401-08; Special Condition VI.3.d&e	Failure to properly maintain Volatile Organic Compound emission records.
FG-SOURCE	General PTI No. 401-08; Special Condition VI.1	Failure to properly maintain Volatile Organic Compound emission records.
FGFACILITY	Opt-out PTI No. 91-12; Special Condition VI.2.d&e	Failure to properly maintain Hazardous Air Pollutant emission records.

During this inspection, it was noted that Emerald Graphics was double counting the mix ratio of coatings for Volatile Organic Compound that are Hazardous Air Pollutants in the spreadsheets, which led to underestimating emissions of each. Additionally, emissions from isopropyl alcohol wipes are not being accounted for in the recordkeeping.

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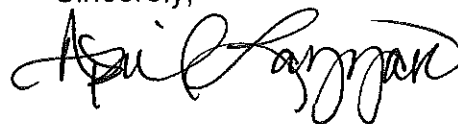
Concerns regarding the condition and operation of the catalytic oxidizer were also identified and discussed during the inspection. The AQD staff requests that Emerald Graphics, Inc. submit a Malfunction Abatement/Preventative Plan pursuant to Michigan Air Pollution Control Rule 336.1911, attached for reference, by March 31, 2017. Additionally, a formal inspection of the unit by a qualified catalytic oxidizer maintenance, inspection and repair company is required. Within 14 days of receipt of the results of the inspection, they shall be submitted to the AQD for review.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 24, 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.

If Emerald Graphics, 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 Emerald Graphics, 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
616-356-0248

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ