

## STATE OF MICHIGAN

## DEPARTMENT OF ENVIRONMENTAL QUALITY





February 24, 2014

Mr. Trevor Wardle, Manager Floracraft, Inc. One Longfellow Place Ludington, Michigan 49431

SRN: N3145, Mason County

Dear Mr. Wardle:

## **VIOLATION NOTICE**

On June 5, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Floracraft Inc. located at One Longfellow Place, Ludington, Michigan. The purpose of this inspection was to determine Floracraft Inc. 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 Permit to Install (PTI) number 245-09B.

During the inspection, staff observed that EU-EXTRUSIONLINE2 had been installed and initially operated. As of the date of this letter, this line has not undergone emissions testing. This constitutes a violation of PTI 245-09B, EU-EXTRUSIONLINE2, V.1 which states:

Within 60 days of achieving the maximum production rate, but not later than 180 days after commencement of initial startup, the permittee shall verify VOC and difluoroethane (HFC-152a) emission rates from the extruder portion of EU-EXTRUSIONLINE2, by testing at owner's expense, in accordance with Department requirements. No less than 60 days prior to testing, the permittee shall submit a complete test plan to the AQD Technical Programs Unit and District Office. The AQD must approve the final plan prior to testing. Verification of emission rates includes the submittal of a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 14, 2014 (which coincides with 21 calendar days from the date of this letter). The written response should include: an explanation of the causes of the violation; 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.

If Floracraft 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 Floracraft 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,

Rob Dickman

Environmental Quality Analyst

Air Quality Division

231-876-4412

cc: Ms. Janis Denman, DEQ

cc/via email: Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ