

Adam Shaffer  
Environmental Quality Analyst  
Air Quality Division  
350 Ottawa Avenue, NW  
Unit 10  
Grand Rapids, MI 49503

4/6/2017



Dear Mr. Shaffer

This letter is in response to a violation notice dated 2/17/2017.

1) Air flow tests for the NFE's.

Six Air flow tests were completed in the last 2 years. The first test was observed by Jennifer Dixon from DEQ and the last test in December 2016 was observed by Adam Shaffer and April Lazzaro of DEQ. We did not complete all of the required tests in the time frame required. A couple of department management changes took place in the last 2 years and the tests were not completed. It will be the responsibility of the plant quality manager to schedule the quarterly tests and maintain the records.

An observed air flow test has been scheduled with DEQ Air Quality on 5/4/17.

2) Ink and solvent usage records.

Monthly ink and solvent records have been maintained by mass balance for more than 10 years that were inspected by DEQ with no issues. Records of each ink and solvent used would require a large increase in the amount of administrative time needed to maintain these records. We do understand that if a HAP is one of the VOC's used we would keep track of that to make sure we have a good understanding of what is coming in and going out of the plant. For example we are reporting the specific use of Hydrotreated Light Distillate (68410-97-9) on a monthly and 12 month rolling period. At this time we would like permission to continue our current record keeping until a new permit to install is issued with this condition removed.

3) Waste records for each ink solvent used.

Waste is being reported as a mass number on a monthly basis.

The ink and solvent waste is generated during a wash cycle on the press. Solvent is pumped through the decks of the press to clean out the colors being used at the end of an order. This solvent will be used several times to clean out the decks and will contain many different ink colors. When it gets too laden with color it will be distilled to reclaim some of the solvent and reused. The balance from the still is sent out as slop (hazardous waste) and used a cement kiln fuel. We have no way of knowing what specific inks or solvents are in any drum of waste being shipped out.

At the suggestion of DEQ we will be preparing a permit to install application. Packaging Personified has retained an outside consultant (Barr Engineering) to file the permit to install application.

This new application will address the rule 205 that DEQ made us aware of.

Correct the CAS number of Hydrotreated Light Distillates.

Amend SC VI.5.c and SC VI.5d on record keeping.

Allen Kupres  
Packaging Personified Inc.  
122 S. Aspen  
Sparta, MI 49426  
616-887-8830 ext 216

## Shaffer, Adam (DEQ)

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**From:** Allen Kupres <allenk@packagingpersonified.com>  
**Sent:** Friday, April 07, 2017 4:36 PM  
**To:** Shaffer, Adam (DEQ)  
**Cc:** James Wood  
**Subject:** Written response  
**Attachments:** DEQ Violation Response 4-6-17.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Adam,  
I have attached our response letter to the violation notice dated 2/17/2017.  
Please let me know if you have any questions.

Allen Kupres  
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