

## STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY GRAND RAPIDS DISTRICT OFFICE



DIRECTOR

October 13, 2017

Ms. Monica Roethlisberger USM Acquisition, LLC 7839 Costabella Avenue Remus, Michigan 49340

SRN: N5101, Mecosta County

Dear Ms. Roethlisberger:

## **VIOLATION NOTICE**

On August 8, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of USM Acquisition, LLC located at 7839 Costabella Avenue, Remus, Michigan. The purpose of this inspection was to determine USM Acquisition, LLC'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; 40 CFR Part 63, Subpart WWWW; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N5101-2013b.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGPLASTICCOMP	40 CFR Part 63, Subpart WWWW, Table 4;	Unattended open containers of HAP containing material
	ROP No. MI-ROP-N5101-2013b, FGPLASTICCOMP, Special Condition III.2	
Dust Room	Rule 370(1);  ROP No. MI-ROP-N5101-2013b  General Condition 9	Improper handling of collected air contaminants

During the inspection, unattended open containers of hazardous air pollutant (HAP) containing materials were observed. The National Emission Standards for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production, Table 4 – Work Practice Standards, and ROP No. MI-ROP-N5101-2013b state that all containers storing HAP containing materials be closed or covered except during the addition or removal of materials.

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During the inspection, large amounts of white particulate matter (PM) were observed on the ground. The white PM was located adjacent to the "Dust Room," and was the result of improper handling of collected air contaminants.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 3, 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.

Please include in the response the following:

 Monthly usage records for each solvent cleaning material used from June 2016 through June 2017.

If USM Acquisition, LLC 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 USM Acquisition, LLC. 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,

Adam Shaffer

**Environmental Quality Analyst** 

Air Quality Division

alm F. Phyh

616-356-0767

cc: Ms. Heidi Hollenbach, DEQ

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Chris Ethridge, DEQ

Mr. Thomas Hess, DEQ