



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

September 28, 2016

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

Mr. Larry Walter, Maintenance Manager  
KIRCHHOFF Van-Robb  
16325 Felton Road  
Lansing, Michigan 48906

SRN: N7138, Clinton County

Dear Mr. Walter:

**VIOLATION NOTICE**

On April 7, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) staff conducted an inspection of KIRCHHOFF Van-Robb located at 16325 Felton Road, Lansing. The purpose of this inspection was to determine compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, Act 451 of 1994, as amended; and the Air Pollution Control Rules.

During this inspection, it was noted that a number of welding cells have adhesive glue application installed and operating at this facility. The adhesive glue contains volatile organic compounds (VOC) which is a regulated pollutant. At the time of inspection, nine of the adhesive glue application areas appeared to meet an exemption rule from permitting. One of the adhesive glue application areas did not appear to meet an exemption rule. There have been numerous discussions regarding options for the unpermitted adhesive glue application area. The last discussion occurred on August 11, 2016. At this point, AQD staff has determined that this is a violation of R 336.1201 (Rule 201) – Permits to Install (PTI).

A program for compliance may include a completed PTI application for the adhesive application process equipment. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml](http://www.deq.state.mi.us/aps/nsr_information.shtml)

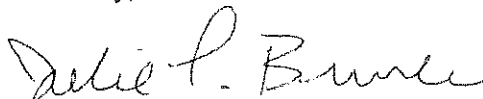
Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 19, 2016. 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 you believe 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. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Julie L. Brunner, P.E.  
Senior Environmental Engineer  
Air Quality Division  
517-284-6789

JLB:TG

cc/via e-mail: Mr. Michael Walsh, KIRCHHOFF Van-Robb  
Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Brad Myott, DEQ