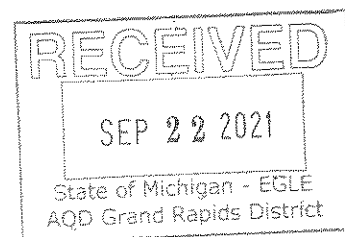




September 14, 2021

To: EGLE, AQD Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503



Cc: Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
P.O. Box 30260
Lansing, MI 48909-7760

On July 13, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) inspected our facility. A violation notice was issued after the following violation was found:

Process Description	Rule/Permit Condition Violated	Comments
FGPROD®RIND	ROP No. MI-ROP-N7221-2019a, FGPROD®RIND, Special Condition III. 3 Rule 910	Failure to operate the dust collector properly as specified by the manufacturer.

R.L. Adams performs preventative maintenance to the dust collector on a weekly and semi-annual basis. The maintenance manual provided by the manufacturer does not specify what the average reading should be, therefore a low reading was considered acceptable by R.L. Adams as the gauges are checked during preventative maintenance for proper function.

AQD staff suggested to reach out to the manufacturer and find out what the acceptable range was for our specific application. R.L. Adams contacted the manufacturer's technical support team and they provided information about the EPA requirements for pressure drop readings. It was suggested to contact a third-party vendor to inspect our dust collectors and determine if EPA requirements apply to us based on the type of dust being generated. The manufacturer also explained that when the dust is too fine the reading might not be as good as it should be and they suggested to test the system by installing a new gauge and compare the two readings.



The actions taken to correct the violation and the plan moving forward is as follows:

1. The five dust collectors were inspected following the manufacturer's recommendations and the system was found to be in order.
2. The maintenance team immediately performed preventative maintenance on the five dust collectors.
3. Two new gauges were ordered to verify the system was functioning according to the manufacturer's suggestions.
4. The vendor that services our dust collectors visited our facility, looked at the dust collectors, reviewed our preventative maintenance program, and quoted a full in-depth service for the five dust collectors.
5. The vendor is coming to visit our facility in the last week of September 2021 to finalize the details of the preventative maintenance program quoted before servicing the dust collectors.

R.L. Adams will inform EGLE staff of the findings after the five dust collectors are serviced by mid-November 2021.

Sincerely,

Anette Arrieta