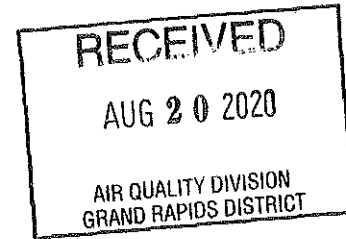




# ADVANCE PACKAGING CORPORATION



August 20, 2020

Ms. Jenine Camilleri  
Enforcement Unit Supervisor  
Michigan Department of Environment, Great Lakes, and Energy (EGLE)  
Air Quality Division  
P.O. Box 30260  
Lansing, MI 48909-7760

**Violation Notice – SRN: N7771**  
**Advanced Packaging Corporation**  
**Kent County, Michigan**

Dear Ms. Camilleri:

This letter is in response to the EGLE-AQD Violation Notice issued July 31, 2020, regarding the site inspection conducted on July 15, 2020, at the Advance Packaging site located at 4459 40<sup>th</sup> Street SE, Grand Rapids, Michigan. For your convenience, the specific EGLE comment/observation is provided below, with our response following.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
8 Flexographic Printing Presses	Rule 201	Failure to obtain a Permit to Install
1 Digital Printing Press	Rule 201	Failure to obtain a Permit to Install

During this inspection, it was noted that Advance Packaging Corporation had installed and commenced operation of unpermitted equipment at this facility. While Advance Packaging Corporation believes the equipment to be exempt from air use permitting, there was no monthly emissions or ink usage data per printing press to demonstrate compliance. The AQD staff advised Advance Packaging Corporation on July 29, 2020, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

As you are aware, Advanced Packaging has previously provided EGLE-AQD with exemption analyses in the past. A change in personnel responsible for keeping the monthly emissions and ink usage data, resulted in our being unable to provide this information to the inspector at the time of the inspection. Following your inspection, it was determined that our supplier, Flint Ink, was indeed providing monthly usage and emissions data; however, it was being sent to the attention of a former employee who no longer works here. A copy of the Flint monthly data for June is provided for your records in Attachment 1.

Using the Flint Ink reports, and purchasing records for the few non-Flint Ink materials we use, we are able to demonstrate that each of the printing presses have met the applicable exemption limits. Copies of the monthly air records for the previous two years are being provided as Attachment 2.

In addition to the monthly air records, a facility-wide Potential to Emit (PTE) Demonstration for all pollutants at the source was requested. A Permit to Install (PTI) Exemption Analysis generated by our environmental consultant, Fishbeck, is provided as Attachment 3.

MAILING: P.O. BOX 888311 • GRAND RAPIDS, MICHIGAN 49588-8311 • FACSIMILE: (616) 954-7385  
4459 40TH STREET, S.E. • GRAND RAPIDS, MICHIGAN 49512-4036 • PHONE (616) 949-6610

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Advanced Packaging Corporation has been working diligently to resolve the identified issues. Starting in August 2020, all materials on the flexographic machines will be processed through the Ink Kitchen, which is capable of tracking the usage for each individual machine. We are confident our updated procedures will prevent a reoccurrence. Please contact me regarding any questions or concerns you may have regarding this response to [salbrecht@advancepkg.com](mailto:salbrecht@advancepkg.com) or 616.949.6610.

Sincerely,

  
Sue Albrecht

Attachments

By email and UPS

Copy: Ms. Heidi Hollenbach – EGLE