



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 31, 2020

Ms. Sue Albrecht
Advance Packaging Corporation
4459 40th Street SE
Grand Rapids, Michigan 49512

SRN: N7771, Kent County

Dear Ms. Albrecht:

VIOLATION NOTICE

On July 15, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Advance Packaging Corporation located at 4459 40th Street SE, Grand Rapids, Michigan. The purpose of this inspection was to determine Advance Packaging Corporation'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); and the Air Pollution Control Rules.

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.

A program for compliance may include a completed PTI application for the unpermitted process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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.

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In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at <http://www/michigan.gov/air>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading. This information was provided to Advance Packaging Corporation via email on July 16, 2020. Please note that the PTE demonstration is now due by the date in the following paragraph.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 21, 2020 (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 submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue, Suite 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Advance Packaging Corporation 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 Advance Packaging Corporation. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE