



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

April 27, 2016

Mr. John Westra
Americraft Carton, Inc
P.O. Box 570
Sturgis, Michigan 49019-0570

SRN: N7829, St. Joseph County

Dear Mr. Westra:

VIOLATION NOTICE

On April 14, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Americraft Carton, Inc (Facility), located at 305 West South Street, Sturgis, Michigan. The purpose of this inspection was to determine the Facility'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 administrative rules; and the conditions of Permit to Install (PTI) No. 218-07B.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGSheetFed	Special Condition III.1 of PTI No. 218-07B	Used cleaning rags stored in open containers.
FGSheetFed	Special Condition V.1 of PTI No. 218-07B	Written approval not obtained to use manufacturer's formulation data.
FGSheetFed	Special Condition VI.1 of PTI No. 218-07B	Calculations not completed by the 15th day of the calendar month.
FGSheetFed	Special Condition VI.3.a of PTI No. 218-07B	Not keeping track, on a calendar month basis, of the amount and type of each volatile organic compound (VOC) containing material used.
FGSheetFed	Special Condition VI.3.b of PTI No. 218-07B	Not tracking, on a calendar month basis, the VOC content of each material as received and applied.
FGSheetFed	Special Condition VI.3.c of PTI No. 218-07B	Not calculating, on a calendar month basis, the VOC mass emissions in tons.

FGSheetFed	Special Condition VI.3.d of PTI No. 218-07B	Not calculating annual VOC emission rate, in tons, per 12-month rolling time period at the end of each calendar month.
FGSheetFed	Special Condition VI.4 of PTI No. 218-07B	The VOC content of the fountain solution, as applied, was not calculated.
Adhesive Machines	R336.1201 (Rule 201)	Adhesive lines not meeting the monthly limit of 200 gallons per month for Rule 287(c)(i).

During this inspection, the Facility was unable to produce emission records. This is a violation of the recordkeeping and emission limitations specified in Special Condition Nos. VI.1, VI.3.a, VI.3.b, VI.3.c, VI.3.d, and VI.4 of PTI No. 218-07B.

The conditions of PTI No. 218-07B require maintenance of records, which shall be made available for review upon request by the AQD staff.

During this inspection, it was noted that the Facility was over the 200 gallon monthly limit in the permit exemption Rule 287(c)(i). Based on calculations the staff performed with the supplied adhesive purchase data, the Facility was using about 404 gallons per month of adhesive. The AQD staff advised the Facility that this was not meeting the exemption.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 18, 2016 (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.

If the Facility 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
269-567-3551

AC:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ
Mr. Dennis Dunlap, DEQ