



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

December 15, 2016

Ms. Marel Riley-Ryman  
Southern Michigan Rubber  
10298 M-60 West  
Three Rivers, Michigan 49093

SRN: N8328, Cass County

Dear Ms. Riley-Ryman:

**VIOLATION NOTICE**

On November 30, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Southern Michigan Rubber (Facility), located at 10298 M-60 West, Three Rivers, 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 203-09.

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

Process Description	Rule/Permit Condition Violated	Comments
EUCUREOVEN	Special Condition II.1 of PTI No. 203-09	More than 10,000 pounds of rubber cured in the cure oven during a 12-month rolling time period.
EUCUREOVEN	Special Condition VI.2.f of PTI No. 203-09	Hours of operation not kept on a daily basis.
EUAUTOCLAVE	Special Condition VI.2.f of PTI No. 203-09	Hours of operation not kept on a daily basis.
FGPLATENPRESSES	Special Condition VI.2.f of PTI No. 203-09	Hours of operation not kept on a daily basis.
Operation of an autoclave	R3336.1201 (Rule 201)	Failure to obtain a PTI prior to installation of a second autoclave.
Installation and operation of a cure oven and autoclave	R3336.1201 (Rule 201)	Failure to obtain a PTI prior to installation of new equipment following a fire.

Ms. Marel Riley-Ryman

Page 2

December 15, 2016

During this inspection, it was noted that the Facility had installed and commenced operation of an unpermitted process/equipment. The AQD determined that this is a violation of Rule 201 of Act 451.

The Facility suffered a catastrophic fire in 2014, and their building containing the autoclave and cure oven was destroyed. The Facility installed new, refurbished equipment when they rebuilt after the fire. The AQD determined this action met the definition of reconstruction, and required a new PTI be obtained before installation and operation of the equipment.

The PTI No. 203-09 limits the Facility to 10,000 pounds of rubber cured in EUCUREOVEN over a 12-month rolling time period. It was noted during the inspection that the Facility cured 18,277.73 pounds of rubber in EUCUREOVEN as of November 2016, which is greater than the permit limit.

A program for compliance may include a completed PTI application for the reconstructed 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 that may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 5, 2017 (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.

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.

Ms. Marel Riley-Ryman

Page 3

December 15, 2016

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. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Mary Douglas, DEQ