



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

July 25, 2017

Mr. Rush Burpee
Landscape Forms, Inc.
5262 East Cork Street
Kalamazoo, Michigan 49001

SRN: P0669, Kalamazoo County

Dear Mr. Burpee:

VIOLATION NOTICE

On June 14, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Landscape Forms Inc. (Facility), located at 5262 East Cork Street, Kalamazoo, 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. 203-15.

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

Process Description	Rule/Permit Condition Violated	Comments
Burn-Off Oven	PTI No. 203-15, Special Condition III.3	Thermocouples were not calibrated at least once per year.
Burn-Off Oven	PTI No. 203-15, Special Condition IV.1	No records for afterburner temperature. Without records, the Facility cannot show that they are meeting the 1400°F or above requirement.
Burn-Off Oven	PTI No. 203-15, Special Condition VI.1	Some records were not being maintained and were not available upon request.
Burn-Off Oven	PTI No. 203-15, Special Condition VI.2	Circular chart monitoring system was not working properly and temperatures were not being recorded.
Burn-Off Oven	PTI No. 203-15, Special Condition VI.3	Facility could not produce maintenance records for the unit.

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During this inspection, the Facility was unable to produce records required by their PTI No. 203-15.

This is a violation of the recordkeeping and emission limitations specified in Special Condition Number IV.1, VI.1, VI.2, and VI.3 of PTI No. 203-15.

The conditions of PTI No. 203-15 require maintenance of records for afterburner temperature, maintenance records, thermocouple calibrations, testing, and malfunctions of the burn-off oven by the 15th day of the calendar month, for the previous calendar month, which shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 15, 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. 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,



Monica Brothers
Environmental Quality Analyst
Air Quality Division
269-567-3552

MB:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ