



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GRETHER
DIRECTOR

June 26, 2017

Mr. Robert Jaros
MLC Research and Development, LLC
130 South Leja Drive
Vicksburg, Michigan 49097

SRN: P0728, Kalamazoo County

Dear Mr. Jaros:

VIOLATION NOTICE

On June 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a complaint investigation of MLC Research and Development, LLC (Facility), located at 130 South Leja Drive, Vicksburg, Michigan. The purpose of this investigation 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; the conditions of Permit to Install (PTI) No. 132-16; and to investigate a recent complaint that the DEQ, AQD, received on June 19, 2017, regarding foul odors and smoke attributed to Facility operations.

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

Process Description	Rule/Permit Condition Violated	Comments
EUROTARTYDRYER	R 336.1901 (Rule 901) and General Condition 6 of PTI No. 132-16	Strong and persistent odors were detected off-site.
EUROTARY DRYER	R 336.1301 (Rule 301), and General Condition 11, and Special Condition I.4 of PTI No. 132-16	Opacity exceeded PTI limit of 10% per 6-minute average.

During this inspection it was noted that the Facility's rotary dryer processes were emitting opacity in excess of emissions allowed by Rule 301 of Act 451. The AQD staff observed that the opacity of EUROTARYDRYER was over 10 percent, steadily, for over an hour during the complaint investigation.

In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency, and duration so as to constitute a violation of Rule 901 and General Condition Number 6 of PTI No. 132-16. The AQD staff detected odors in a residential area near the Facility.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 17, 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. 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

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