



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 11, 2020

Mr. Jeremy Hopkins
American Rack Company
1125 Morren Court
Wayland, Michigan 49348

SRN: P0893, Allegan County

Dear Mr. Hopkins:

VIOLATION NOTICE

On November 21, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of American Rack Company located at 1125 Morren Court, Wayland, Michigan. The purpose of this inspection was to determine American Rack Company'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) number 16-18;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-DIPCOAT	Special Condition VI.4	American Rack is required to perform and maintain daily records of visible emission readings on EU-DIPCOAT. At the time of the inspection staff was informed that the facility was not conducting or maintaining record of the daily visible emission readings.
EU-DIPCOAT	Special Condition VI.5	The facility is required to continuously monitor the temperature of the thermal oxidizer associated with EU-DIPCOAT. The facility is also required to maintain record of the thermal oxidizer while EU-DIPCOAT is in operation at least once every 15 minutes. During the inspection Staff was shown records of the initial records when the thermal oxidizer was started up, however records were not maintained and recorded every 15 minutes as required by the permit.

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During this inspection, American Rack Company was unable to produce emission records. This is a violation of the recordkeeping specified in Special Condition VI.4 and Special Condition VI.5 of PTI number 16-18. The conditions of PTI number 16-18 require the visible emission records and thermal oxidizer temperature monitoring records shall be made available for review upon request by the AQD staff.

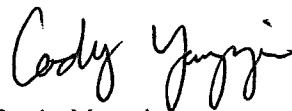
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 1, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If American Rack Company 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 American Rack Company. 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,



Cody Yazzie
Environmental Engineer
Air Quality Division
269-567-3554

Enclosure

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