



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

April 15, 2022

Mario Veldhuijzen  
Innotec  
233 West Washington  
Zeeland, Michigan 49464

SRN: P1126, Ottawa County

Dear Mario Veldhuijzen:

**VIOLATION NOTICE**

On March 16, 2022, March 21, 2022, March 25, 2022, March 29, 2022 and April 7, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted odor evaluations of Innotec located at 233 West Washington, Zeeland, Michigan. The purpose of these evaluations was to determine Innotec'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 to follow-up on recent complaints which we received on February 25, 2022 and March 24, 2022, regarding burnt oil/rubber odors attributed to Innotec's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Mill scale dryer/plastic extrusion	Rule 901(b)	Moderate to strong burnt oil odors observed emitting from the facility and impacting nearby neighborhoods.

The AQD staff detected moderate to strong burnt oil odors impacting nearby neighborhoods downwind from Innotec on five (5) occasions. 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 of the administrative rules promulgated under Act 451.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 6, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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Please submit the written response to the violation to EGLE, AQD, Grand Rapids District Office, 350 Ottawa Avenue, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

In addition, during the recent inspection conducted on March 16, 2022, the AQD determined that the permit exemption determination provided by Innotec in April 2019 was not adequate for the Mill scale dryer/plastic extrusion line. Specifically, the facility had inaccurately defined the emission unit. Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278a, an exemption demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- A description of the exempt process or process equipment, including the date of installation.
- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

The AQD requests that Innotec demonstrate either the Mill scale dryer/plastic extrusion line is exempt from the requirements of Rule 201 or submit a Permit to Install (PTI) application for the subject line at the facility. Please submit this demonstration to me at EGLE, AQD, Grand Rapids District Office, 350 Ottawa Avenue, Unit 10, Grand Rapids, Michigan 49503 by May 11, 2022.

The Michigan Air Pollution Control Rules can be accessed through the following website: [www.michigan.gov/air](http://www.michigan.gov/air). Click on the "News & Info" tab; at the right side of the window, click on "State Air Laws and Rules," then "Air Pollution Control Rules." A digital copy of the Permit to Install Exemption Handbook can be found on this website under the "State Air Laws and Rules"; click on "Part 2, Exemptions, Rules 278 through 291."

If Innotec 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 violation cited above and for the cooperation that was extended to me during my inspection of Innotec. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Robinson".

Chris Robinson  
Environmental Quality Analyst  
Air Quality Division  
616-286-0083

cc: Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Jenine Camilleri, EGLE  
Christopher Ethridge, EGLE  
Heidi G. Hollenbach, EGLE  
Nic Berkenpas, Innotec