



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 24, 2019

Mr. Tom O'Malley
Kassouni Manufacturing, Inc.
815 South Front Street
Belding, Michigan 48809

SRN: A1702, Ionia County

Dear Mr. O'Malley:

VIOLATION NOTICE

On July 22, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a site review of Kassouni Manufacturing, Inc. located at 815 South Front Street, Belding, Michigan. The purpose of this site review was to determine Kassouni Manufacturing, Inc.'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 investigate a recent chlorine gas release that occurred on July 19, 2019 associated with Kassouni Manufacturing, Inc.'s operations.

During the site review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Tableting Process Area	Rule 370(1)	Failure to properly collect and dispose of an air contaminant.

On July 19, 2019, a chlorine gas release occurred due to the chemical reaction of trichloroisocyanuric acid sweepings in the dumpster. The improper collection and disposal of these particulate sweepings constitutes a violation of Rule 370. Rule 370 requires that an air contaminant (i.e., the sweepings) be collected and disposed of in a manner to minimize the introduction of contaminants to the outer air. A similar incident occurred on June 22, 2019 and was cited in a Violation Notice dated July 3, 2019.

The AQD is again requiring that Kassouni Manufacturing, Inc. take **immediate action** to properly store, collect, contain, and dispose of the trichloroisocyanuric acid powder to avoid any contact with water in the facility, and operate the facility in a manner consistent with safety and good air pollution control practices for minimizing emissions to prevent any negative impacts to nearby residents in the event of a chlorine gas release.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 7, 2019 (which coincides with 14 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.

Please note that as of the date of this letter, a written response has not been received from Kassouni Manufacturing, Inc. in response to the Violation Notice dated July 3, 2019. A written response was due to EGLE, AQD by July 24, 2019.

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

If Kassouni Manufacturing, Inc. 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 violation cited above and for the cooperation that was extended to me during my site review of Kassouni Manufacturing, Inc. 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,



Kaitlyn DeVries
Environmental Quality Analyst
Air Quality Division
616-558-0552

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE
Mr. Dave Wierzbicki, EGLE