



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

April 16, 2021

Mr. Thomas Leonardo
General Manager
Great Lakes Rubber Company
30573 Beck Road
Wixom, MI 48393

SRN: B8919, Oakland County

Dear Mr. Leonardo:

VIOLATION NOTICE

On March 16, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Great Lakes Rubber Company located at 30573 Beck Road, Wixom, Michigan. The purpose of this inspection was to determine Great Lakes Rubber 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 174-19 and 146-14A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Facility-Wide	PTI No. 146-14A, FG-FACILITY S.C. VI.3.	The facility was unable to produce accurate and complete records of facility-wide hazardous air pollutants (HAPs) emission calculations.
EU-CURINGOVEN	PTI No. 174-19, S.C. VII.1.	EGLE was previously notified that the curing oven began operation in September of 2020. However, during the inspection, it was indicated that the curing oven began operation in February 2020. This is a violation of the requirement to notify EGLE within 30 days after completion of installation or construction of the curing oven.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 7, 2021 (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. As a part of the violation response, AQD staff are requesting that Great Lakes Rubber Company submit monthly HAP emission records to demonstrate that the recordkeeping requirements are met going forward. These records should be submitted by the 15th of each month for the preceding month.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Great Lakes Rubber 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 Great Lakes Rubber 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,



Kaitlyn Leffert
Environmental Quality Analyst
Air Quality Division
586-249-6505

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