



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



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

February 10, 2020

Mr. Lane Brumm  
 Rosler Metal Finishing, USA  
 1551 Denso Road  
 Battle Creek, Michigan 49037

SRN: N7321, Calhoun County

Dear Mr. Brumm:

**VIOLATION NOTICE**

On January 24, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Rosler Metal Finishing USA (Facility) located at 1551 Denso Road, Battle Creek, Michigan. The purpose of this inspection 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; and the conditions of Permit to Install (PTI) number 27-11 and 125-08A;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPyrolysis	PTI No. 27-11, Condition II.3	Based on 2019 facility records, the allowed material batch limit for thermal removal of polyurethane linings was exceeded on three occasions; one in August, and two in December. The highest exceedance was on December 9, 2020. The limit is 878 pounds of polyurethane removed per batch. Facility removed 1,239 pounds.

During the records review, it was noted that Condition II.3 limiting the facility to thermally remove not more than 878 pounds of polyurethane linings per oven batch was

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exceeded three times. The highest exceedance of this limit was on December 9, 2019 and the facility removed 1,239 pounds of polyurethane lining.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 2, 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 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 and for the cooperation that was extended to me during my inspection of Rosler Metal Finishing USA. 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,



Amanda Chapel  
Environmental Quality Analyst  
Air Quality Division  
(269)910-2109

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