



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

January 7, 2022

Mr. Ted Jacob, Owner
Thermaseal Inc.
141 Peyerk Court
Bruce Township, MI 48065

SRN: P1198, Macomb County

Dear Mr. Jacob:

VIOLATION NOTICE

On December 3, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Thermaseal Inc. located at 141 Peyerk Court, Bruce Township, Michigan. The purpose of this inspection was to determine Thermaseal 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.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Rotogravure printing operation	Rule 201	Thermaseal Inc. installed and commenced operation of this equipment without a permit to install. This unit is excluded from the permit to install exemptions specified in Rule 280 to 291 pursuant to Rule 278 (2). Specifically, the facility's potential HAP emissions exceed the major source threshold, and the unit is subject to 40 CFR Part 63, Subpart KK (MACT KK).
Solvent based cold cleaner	Rule 201	Thermaseal Inc. installed and commenced operation of a solvent based cold cleaner (contains toluene). This unit is excluded from the permit to install exemptions specified in Rule 280 to 291 pursuant to Rule 278 (2) due to being installed concurrently with the rotogravure printing operation.

Rotogravure printing operation	Rule 624	Thermaseal Inc. installed and operated a rotogravure printing process without an add-on emissions control device. This process is subject to a minimum 65% volatile organic compound reduction efficiency under Rule 624.
Rotogravure printing operation	MACT KK	Thermaseal Inc. is not in compliance with MACT KK. Organic HAP emissions from this process are limited by MACT KK to no more than 5% of the organic HAP applied for the month.

During this inspection, it was noted that Thermaseal Inc. had installed and commenced operation of unpermitted processes at this facility. This is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the rotogravure printing operation and solvent based cold cleaner. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Thermaseal Inc. submitted a document to AQD claiming that the rotogravure printing process is exempt from Rule 201 requirements pursuant to Rule 290. This document did not contain actual emissions. Only theoretical emissions were provided, which are based on an assumed 10 hours/month operation. The 10 hours/month assumption is not an enforceable limit. To be exempt per Rule 290, the emission unit cannot be excluded from exemption as stated in Rule 278 and the company must keep records of material use and calculations identifying the quality, nature, and quantity of the air contaminant emissions are maintained in sufficient detail to demonstrate that the emissions meet the emission limits outlined in Rule 290 for a period of two years.

Rule 278 states that permit to install exemptions do not apply to the construction of a new major source of HAPs which is subject to National Emission Standards for Hazardous Air Pollutants (NESHAP) standards. Major source of HAPs means any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

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Thermaseal Inc. did not submit records, required in Rule 290(2)(d) and (e), showing that their actual emissions are compliant with Rule 290 since beginning operation, so they cannot use the limits in Rule 290 as their PTE. The PTE must be calculated based on maximum equipment capacity operating 24/7.

The rotogravure printing operation is currently operated uncontrolled. Calculations provided by Thermaseal Inc. estimate total uncontrolled VOC emissions at 138.02 lbs/hour. Assuming 24/7 operation for 365 days a year (138.02 lb/hour * 8760 hours) yields an annual VOC emission rate of 604 tons. The calculations also show that there would be 102.5 tons of hazardous air pollutants (HAPs) emitted annually (all toluene).

Additionally, as a major source of HAPs, Thermaseal Inc. is subject to 40 CFR Part 63, Subpart KK – National Emissions Standards for the Printing and Publishing Industry.

Be advised, R 336.1211(a)(ii) of the Michigan Administrative Code (MAC) requires sources that directly emit or have the potential to emit 100 tons/year or more of VOC or 10 tons/year or more of an individual HAP to obtain a Renewable Operating Permit (ROP). R 336.1210 prohibits the operation of a source required to have an ROP except in compliance with all applicable terms and conditions of an ROP, unless a timely and administratively complete ROP application has been received. Per R 336.1210(4), for a stationary source that is or becomes a major source, as defined by R 336.1211(1)(a)(i) to (iii), an administratively complete application shall be considered timely if it is received by the department not more than 12 months after the stationary source commences operation as a major source or otherwise becomes subject to the requirements to obtain a renewable operating permit as a major source.

Sources which have a potential to emit greater than 250 tons per year of a regulated new source review (NSR) pollutant are subject to Prevention of Significant Deterioration of Air Quality (PSD) regulations under 40 CFR 52.21.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 28, 2021 (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.

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.

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If Thermaseal 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 inspection of Thermaseal 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,



Adam Bogner
Environmental Engineer
Air Quality Division
586-854-1517

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