



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

January 23, 2019

Mr. Tom VanderHenst  
Innotec  
233 West Washington Avenue  
Zeeland, Michigan 49464

SRN: U701611765, Ottawa County

Dear Mr. Tom VanderHenst:

### SECOND VIOLATION NOTICE

On January 8, 2019 and January 11, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted follow up investigations to determine if actions taken by Innotec, located at 233 West Washington Avenue, Zeeland, Michigan, have addressed the Rule 901 violation cited in an October 18, 2018 letter. It is the professional judgment of AQD staff that the actions taken thus far have not adequately addressed the violation. AQD staff observed strong persistent plastic odors during both investigations.

Initially, on September 28, 2018, October 4, 2018, October 5, 2018 and October 10, 2018, the AQD conducted investigations in the area around Innotec. The purpose of these investigations 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 investigate complaints which were received on September 28, 2018, October 3, 2018 and October 8, 2018, regarding strong plastic odors attributed to Innotec's operations

On October 18, 2018, the AQD sent Innotec a Violation Notice citing violations discovered as a result of the inspection and requested your written response by November 8, 2018. The AQD received Innotec's response letter dated November 6, 2018. In the response, Innotec indicated that it would be taking actions to address the Rule 901 violation. The AQD acknowledges that Innotec has been forthcoming and has taken some actions in an attempt to address the issue. Even after attempting to correct the violation, the odors observed were of comparable intensity, frequency and duration as those cited in the Violation Notice dated October 18, 2018.

Please provide a written response indicating what further actions will be taken to properly address the violation of Rule 901. Please also include an appropriate permit exemption demonstration in accordance with Rule 278(a) for the mill scale dryer and the plastic extrusion line. If the selected permit exemption requires record keeping and emission calculations, please provide records for the past three months (October through December of 2018).

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Please be advised that failure to respond in writing and identifying actions Innotec will take or has taken to resolve the cited violation may result in escalated enforcement action by the AQD. Please provide the requested information by February 6, 2019, which corresponds to 14 days from the date of this letter. Please also be advised that if the emission units do not meet an exemption from Rule 201, a Permit to Install will be needed.

Please submit the written response to the DEQ, 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 the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violation or the action necessary to bring Innotec into compliance, please contact me at the number listed below.

Sincerely,



Tyler Salamasick  
Environmental Quality Analyst  
Air Quality Division  
616-558-1281

Enclosure

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