



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 30, 2021

Mr. James Wilson
Irwin Seating Company
3251 Fruitridge Road NW
Grand Rapids, Michigan 49544

SRN: B0333, Kent County

Dear Mr. Wilson:

VIOLATION NOTICE

On August 26, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Irwin Seating Company located at 3251 Fruitridge Road NW, Grand Rapids, Michigan. The purpose of this inspection was to determine Irwin Seating 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 271-91.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Wood Coating	PTI No. 271-91, Special Condition 17	Failure to keep records of usage and VOC content of coating materials.
Wood Coating	PTI No. 271-91, Special Condition 18	Failure to calculate and keep records of VOC emissions.

During this inspection, Irwin Seating Company was unable to produce records of coating usage, volatile organic compound (VOC) content of coating materials, and VOC emissions. This is a violation of the recordkeeping requirements specified in Special Conditions 17 and 18 of PTI number 271-91.

The conditions of PTI number 271-91 require records of usage rates of each coating, reducer, and glue used for the coating process and VOC content of coating materials as well as calculations of VOC emission rates from the coating process for each calendar month, to be made available for review upon request by the AQD staff.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 21, 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.

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 Irwin Seating 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 Irwin Seating 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,

Michael T. Cox

Michael Cox
Environmental Quality Analyst
Air Quality Division
616-240-3607

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