



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

May 12, 2023

Michael Clay
General Formulations, Inc.
309 South Union Street
Sparta, Michigan 49345

SRN: M3554, Kent County

Dear Michael Clay:

VIOLATION NOTICE

On May 8, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a letter from General Formulations, Inc. located at 309 South Union Street, Sparta, Michigan. This letter documented that the existing Regenerative Thermal Oxidizer (RTO) was below the minimum operating temperature required by Permit to Install (PTI) number 192-03G.

The letter detailed the following violation:

Process Description	Rule/Permit Condition Violated	Comments
FG-C&NewMixroom	PTI No. 192-03G, FG-C&NewMixroom, Special Condition IV.2. and Rule 910	Failure to maintain a three-hour rolling average combustion zone temperature of at least 1400°F or the minimum combustion zone temperature from the most recent acceptable stack test.

The self-reported letter details operation of EU-CoaterC and EU-NewMixroom while the existing RTO was not operating properly for fourteen (14) hours, which is a failure to maintain a three-hour rolling average combustion zone temperature of at least 1400°F or the minimum combustion zone temperature from the most recent acceptable stack test. This constitutes a violation of PTI No. 192-03G and of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

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An updated Malfunction Abatement Plan (MAP) for the existing RTO is required by PTI No. 192-03G, FG-C&NewMixroom, Special Condition III.4 within 180 days of trial operation. Please submit the MAP as well as determine if any emission exceedances of PTI No. 192-03G, FG-TACs, Special Conditions I.1-6 occurred and submit this evaluation.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 2, 2023 (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, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If General Formulaitons, 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. 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,



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

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE