

GRETCHEN WHITMER GOVERNOR STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK DIRECTOR

September 8, 2021

EMAIL and CERTIFIED MAIL

Mr. Darrell Ward Pollard Banknote Limited 775 James L Hart Pkwy Ypsilanti, MI 48197

SRN: N1622, Washtenaw County

Dear Mr. Ward:

VIOLATION NOTICE

On September 1, 2021, the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted an announced compliance inspection of Pollard Banknote Limited (Company) located at 775 James L. Hart Parkway, Ypsilanti Michigan. The purpose of this inspection was to determine the 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) and the associated Air Pollution Control Rules, and conditions of Permit to Install (PTI) 89-99K.

During the inspection and subsequent records review, AQD staff determined the following:

	Rule/Permit	
Process Description	Condition Violated	Comments
EU-TRESU- flexographic printing line.	PTI 89-99K Special Condition VIII. STACK/VENT RESTRICTION(S)- 2. SV_WB-01 & 3, SV_WB-02	2 Uncontrolled water-based stacks vent horizontally instead of vertically. (This was also a requirement under recently voided PTI 89-99J.)
EU-COMCO	PTI 89-99K Special Condition VIII. STACK/VENT RESTRICTION(S)- 1. SV-COMCO	Stack does not vent unobstructed vertically upward; has rain cap. (This was also a requirement under recently voided PTI 89-99J.)

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 23, 2021. 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 written response to the EGLE, AQD Jackson District, at 301 East Louis B Glick Highway, Jackson, Michigan 49201, and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760. 301 EAST LOUIS GLICK HIGHWAY • JACKSON, MICHIGAN 49201-1556 Mr. Darrell Ward Pollard Banknote Limited Page 2 September 8, 2021

If the 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 recent inspection. 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,

Mike Kovalchick

Mike Kovalchick Senior Environmental Engineer Air Quality Division 517-416-5025

cc: Scott Miller, EGLE Chris Ethridge, EGLE Jenine Camillari, EGLE Jeff Rathbun, EGLE