

September 14, 2018

Ms. Jenine Camilleri  
Michigan DEQ, AQD  
7953 Adobe Road  
Kalamazoo, MI 48909

Dear Ms. Camilleri,

**Violation Notice Response**



On August 16<sup>th</sup>, 2018 your local DEQ inspector conducted an unannounced inspection of our facility. We were fully cooperative with this inspection, as we take our commitment to environmental impact very seriously. As a result of this inspection we received a “violation notice”, citing three conditions that we are in violation of. This letter is in response to that notice.

Since the visit we have taken actions to remedy these violations as follows:

**Comment 1: The facility installed two ink jet printers without first obtaining a permit or showing that they were installed using a permit exemption.**

We installed the inkjet equipment mentioned above in April 2018. Since the recent visit, we did receive the new permit to allow for the operation of two new saddle stitching finishing processes. PTI no. 232-97G. The equipment we have been running does not generate additional VOCs above what we would have been doing otherwise. All of our mailing that is generated at our facility is printed on inkjet equipment. This new equipment is just moving that operation in line with a binder, so we can do the operation more efficiently. So in effect, we aren't doing any more “ink jetting” with this equipment than we would have done otherwise.

**Comment 2: The facility has yet to develop and submit for AQD review and approval a Malfunction Abatement Plan for their two control devices (RTOs).**

This violation has been ongoing since the previous visit in August of 2014. Since the recent visit I have been working with two of our service vendors to create a MAP for each of these units. I have a good example from one of the vendors, that was created for another of their customers that will serve as a good template. We do service these units regularly, so it is just a matter of writing the processes out and defining ownership for getting them done. We track the operation of the units with data loggers, so we can demonstrate the performance of the units in correlation with the operation of those presses that they serve. My intent is to have this completed and sent back to the inspector by the end of October, 2018.

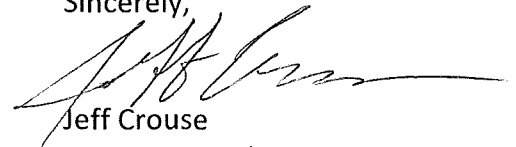
When I have finalized the MAP programs, I will submit them through Matt Deskins for final approval as requested.

**Comment 3: The facility has not done any volatile organic compounds testing using Method 24 or 24A for the materials they receive and/or as applied. Back in 2014, the Facility has requested to use manufacturer's formulation data instead ,but additional information that the AQD had requested was never provided.**

This violation was first noted in August of 2014. Since the recent visit, I have provided all new SDS sheets to the inspector. I then contacted the vendors for all of the chemicals used, in order to have them provide the formulation data. I received response letters from two different vendors and provided those back to the inspector. Upon review of the letters, he and his supervisor deemed them inadequate to fulfill the requirements of this rule.

On Sept 11<sup>th</sup> I contacted our environmental consulting company and requested quotes to set up VOC testing on our affected chemicals. He responded that he would get quotes on those services and get them back to me. I do not have those quotes as of this date. Once we have received the quotes, we will set up testing as required and submit them to the inspector for review. My intent is to have this completed sometime in October, 2018.

Sincerely,



Jeff Crouse

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