



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

September 19, 2023

Michael Clark
Mannetron
74 Leonard Wood Road
Battle Creek, MI 49037

SRN: N3914, Calhoun County

Dear Michael Clark:

VIOLATION NOTICE

On August 23, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Mannetron located at 74 Leonard Wood Road, Battle Creek, Michigan. The purpose of this inspection was to determine Mannetron 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 461-93;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Paint Booth	PTI 461-93	Permit requires submittal of records for coating usage (past 2 years) and MSDS information on coatings used at facility. No records were submitted.
Fiberglass Layup Operations	Rule 201	Facility must submit emissions calculations for the most recent 2-year period demonstrating the operation can comply with emissions limits listed in the Rule 290 exemption. No records were submitted.
Silicone rubber material application	Rule 201	Facility must submit adhesive material usage records demonstrating the operation can comply with

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		the usage limit in the Rule 287(a) exemption. No records were submitted.
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During this inspection, Mannetron was unable to produce emission records.

This is a violation of (the recordkeeping and emission limitations) specified in Special Condition (SC) #15, 17, 21, and 22 of PTI number 461-93.

The conditions of PTI number 461-93 require the permittee to make available upon request demonstration of compliance with the established emission limit (SC #15), material usage limit (SC #17), material usage rate recordkeeping (SC #22) and a list of all coatings used at the facility with their VOC content (SC #22).

During this inspection, it was noted that Mannetron had commenced operation of an unpermitted process at this facility (fiberglass layup and silicone rubber material application). The AQD staff advised Mannetron on August 23, 2023, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451 unless the operations qualify to utilize an exemption and the facility is keeping any records that may be required by that exemption. **If you believe the exemptions from permitting listed above are applicable to these operations, please provide the records required by each exemption to demonstrate their applicability.**

A program for compliance may include a completed PTI application for the fiberglass layup and silicone rubber material application process equipment. An application form is available by request, or at the following website: www.michigan.gov/air. Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 10, 2023 (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.

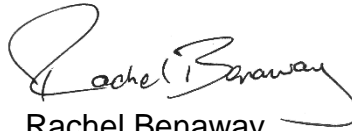
Please submit the written response to Rachel Benaway at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or BenawayR@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If Manetron 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 Mannetron. 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,

A handwritten signature in black ink that reads "Rachel Benaway". The signature is written in a cursive style with a large, looping initial "R".

Rachel Benaway
Environmental Quality Analyst
Air Quality Division
269-370-2170

cc: Cannabis Regulatory Agency
CRA-Enforcement@michigan.gov.
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Monica Brothers, EGLE