



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE

Scott



LIESL EICHLER CLARK
DIRECTOR

February 1, 2019

CERTIFIED MAIL – 7017 3380 0000 4105 8360
RETURN RECEIPT

Ms. Lisa Bascom
Brooklyn Products Incorporated
171 Wampplers Lake Rd
Brooklyn, Michigan 49230

SRN: N5374, Lenawee County

Dear Ms. Bascom:

VIOLATION NOTICE

On November 28, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Brooklyn Products Incorporated located at 171 Wampplers Lake Rd, Brooklyn, Michigan. The purpose of this inspection was to determine Brooklyn Products Incorporated'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 Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Hot wire cutting booth	R 336.1201 (Rule 201)	Neither a Permit to Install (PTI) application nor an applicable permit exemption has been provided for this source.
Oven dryers (2)	R 336.1201	Neither a PTI application nor an applicable permit exemption has been provided for this source.

During this inspection, it was noted that Brooklyn Products Incorporated had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised Brooklyn Products Incorporated on December 19, 2018, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451. The AQD staff also requested Brooklyn Products Incorporated provide information to determine whether the operations may qualify for a permit exemption. A response was not received.

A program for compliance may include a completed PTI application for the hot wire cutting booth process equipment and the two oven dryers. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right-hand side of the page).

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 February 22, 2019. 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 the DEQ, AQD, Jackson District, at 301 E Louis Glick Hwy, Jackson, Michigan 49201 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Brooklyn Products Incorporated 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 Brooklyn Products Incorporated. 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,



Stephanie Weems
Environmental Quality Analyst
Air Quality Division
517-416-3351

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Scott Miller, DEQ