



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

May 15, 2023

Kevin DeGraves
Andronaco Industries
4242 44th Street SE
Kentwood, Michigan 49512

SRN: N5535, Kent County

Dear Kevin DeGraves:

VIOLATION NOTICE

On April 6, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Andronaco Industries Plant 3, located at 4242 44th Street, Kentwood, Michigan. The purpose of this inspection was to determine Andronaco Industries' 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) numbers 176-19 and 29-20.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGPLANT3	PTI No. 29-20, FGPLANT3, Special Condition No. VI.3.a, d & e	Failure to properly calculate Volatile Organic Compound (VOC) and acetone emissions.
FGPLANT3	PTI No. 29-20, FGPLANT3, Special Condition No. VI.3.b & c	Failure to properly track usage of resins and styrene content.
FGFACILITY	PTI No. 29-20, FGFACILITY, Special Condition No. VI.3.f	Failure to maintain accurate 12-month rolling total aggregate Hazardous Air Pollutant (HAP) emissions.
FGFACILITY	PTI No. 29-20, FGFACILITY, Special Condition No. VI.4	Failure to properly calculate styrene emissions per 12-month rolling time period.

During this inspection, the recordkeeping provided by Andronaco Industries was not accurate. Specifically, the recordkeeping spreadsheet contains errors pertaining to the acetone emissions, which are not being accurately calculated as a result. This is a violation of PTI No. 29-20, Special Condition No. VI.3.a, d & e.

The permit requires that the facility identify and use an appropriate emission factor for each material used. A listing of materials used and associated emission factors are not contained in the recordkeeping. This is a violation of PTI No. 29-20, Special Condition No. VI.3.b & c. Additionally, it is noted that several months have identical usage and emissions reported for both resins and acetone.

Recordkeeping for the tracking of aggregate HAPs indicates that the total HAP emissions are less than the emissions of styrene individually. Emissions of aggregate HAP should be the same, or greater than, the highest individual HAP, therefore the data is not correct. This is a violation of PTI No. 29-20, Special Condition No. VI.3.f.

Recordkeeping for styrene is not being done on a 12-month rolling total basis. As such, this is a violation of PTI No. 29-20, Special condition No. VI.4.

In addition to addressing the violations noted above, the AQD requests that Andronaco Industries conduct a facility-wide inventory of equipment and identify the permitted or exempt status of each. It is noted that a stack is associated with the EUCOMP MIXING activities that was not identified in the permit application. An evaluation of whether a permit modification is required because of this change should be included. Two stacks are associated with EUPULTMOLDING which were not identified in the permit application. An evaluation of whether a permit modification is required because of this change should be included.

There are several ovens of various sizes that are being used to sinter polytetrafluoroethylene (PTFE) and other plastics that are not permitted. Be advised, Rule 201 of the administrative rules promulgated under Act 451 requires that an air use permit to install (PTI) 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.

However, certain processes and process equipment may be exempt from obtaining a PTI. Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- A description of all the exempt process or process equipment at the facility, including the date of installation.
- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at:
<https://www.michigan.gov/egle/about/organization/air-quality/air-permits/new-source-review/potential-to-emit>.

Finally, it is noted that Andronaco Industries Plant 1, SRN P0631, utilizes product made at this facility (Plant 3). AOD requests that Andronaco Industries conduct a Stationary Source Determination to identify whether the buildings identified as Plant 1, Plant 2 and Plant 3 are one stationary source. Information on AOD Policy and Procedure AOD-011 on Stationary Source Determinations can be found at: <https://www.michigan.gov/-/media/ProjectWebsites/egle/Documents/Policies-Procedures/AOD/aqd-011>. Please include this information within 30 days of the date of this letter, along with the Rule 278 and PTE requests above.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 5, 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 EGLE, AOD, 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, AOD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Andronaco Industries 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 Andronaco Industries. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

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