



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 11, 2019

Mr. Lonnie Shipley
Vice President of Operations
NTVB Media
213 Park Drive
Troy, MI, 48083

SRN: N7097, Oakland County

Dear Mr. Shipley:

VIOLATION NOTICE

On July 25, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of NTVB Media located at 209 Park Street, Troy, Michigan. The purpose of this inspection was to determine NTVB Media'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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 15-02A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-NewLitho-Offset Lithographic Printing Process controlled by a Regenerative Thermal Oxidizer (RTO)	R 336.1910 PTI No. 15-02A, SC 2.6	The source operated the RTO below the minimum temperature specified and required in the permit while the process was operating.

On July 25, 2019, AQD staff observed records indicating that the lithographic printing lines were operating while the regenerative thermal oxidizer was operating below the minimum required temperature. PTI No. 15-02A requires a minimum temperature of 1450°F to be maintained in the regenerative thermal oxidizer. During the inspection, AQD staff received temperature records for the RTO which indicate that the RTO temperature was regularly below 1450°F while the process was in operation.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. This also constitutes a violation of PTI No. 15-02A, Condition 2.6.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 2, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If NTVB Media 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 violation cited above and for the cooperation that was extended to me during my inspection of NTVB Media. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kaitlyn Leffert
Environmental Quality Analyst
Air Quality Division
586-753-3797

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE