



STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY



GRETCHEN WHITMER
GOVERNOR

KALAMAZOO DISTRICT OFFICE

LIESL EICHLER CLARK
DIRECTOR

July 8, 2019

Mr. James Knapke
Pratt Industries
11356 Red Arrow Highway
Bridgman, Michigan 49106

SRN: N7486, Berrien County

Dear Mr. Knapke:

VIOLATION NOTICE

On July 3, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Pratt Industries located at 11356 Red Arrow Highway, Bridgman, Michigan. The purpose of this inspection was to determine Pratt 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

- to investigate a recent complaint which we received on July 3, 2019, regarding (Open Burning.) attributed to Pratt Industries operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Open Burning	Rule 310	Facility was burning waste wooden pallets in in an open lot on the property. Staff provided James Knapke with a copy of Rule 310. Staff showed Mr. Knapke that the State of Michigan open burning rules only allow for limited materials to be burned. Waste wooden pallets are not included in the accepted material.

On July 3, 2019, AQD staff observed

- open burning of waste wooden pallets at Pratt Industries.

This constitutes a violation of Rule 310 of the administrative rules promulgated under Act 451, which prohibits open burning of refuse, garbage, or any other waste material at any business or commercial operation.

In order to comply with Rule 310, Pratt Industries is advised to immediately discontinue any open burning.

EGLE encourages the reuse and the recycling of wastes whenever possible. However, any waste that cannot be reused or recycled must be properly disposed of in accordance with Part 115, Solid Waste Management, Section 11512(1) of Act 451. Additionally, if Pratt Industries decides to incinerate their waste, it must be incinerated in a properly designed incinerator.

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An approved permit must be obtained from EGLE before commencing installation of any incinerator. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page)

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 29, 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, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pratt 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 violation cited above and for the cooperation that was extended to me during my inspection of Pratt Industries. 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,



Cody Yazzie
Environmental Engineer
Air Quality Division
269-567-3554

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