



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHUR  
DIRECTOR

November 4, 2016

Mr. Peter Silverstein, Plant Manager  
M. Argueso & Co., Inc. (DBA Paramelt)  
2817 McCracken Street  
Muskegon, Michigan 49441

SRN: N7764, Muskegon County

Dear Mr. Silverstein:

**VIOLATION NOTICE**

On October 6, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of M. Argueso & Co., Inc. located at 2817 McCracken Street, Muskegon, Michigan. The purpose of this inspection was to determine M. Argueso & Co., Inc.'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 57-07.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two (2) hotbox reclaim processes	Rule 201	Emissions exceed Rule 290 exemption limits.

During this inspection, it was noted that M. Argueso & Co., Inc. had previously installed and commenced operation of equipment for two (2) hotbox reclaim processes under Rule 290 at this facility. A detailed recordkeeping review revealed that for each hotbox, M. Argueso & Co., Inc. did not keep individual emission unit records consistent with the requirements of Rule 290. In addition, the facility exceeded the maximum allowable emissions for both hotboxes in March and August 2016. The AQD staff advised M. Argueso & Co. Inc., on October 27, 2016, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for both hotbox reclaim processes. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml](http://www.deq.state.mi.us/aps/nsr_information.shtml)

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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.

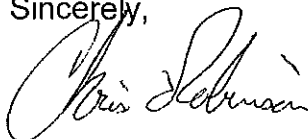
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 28, 2016. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; 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.

Per our discussion on October 28, 2016, M. Argueso & Co., Inc. will be constructing a new building east of their existing building. Please submit information substantiating the use of exemptions for this expansion, by demonstrating the applicability of the exemptions as required in Rule 278a. The records requested via the requirements of Rule 278a shall be submitted within 30 days of this written request or December 4, 2016.

If M. Argueso & Co., Inc. believes the above observations or statements are inaccurate or do not constitute violation 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 M. Argueso & Co., Inc. 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,



Chris Robinson  
Environmental Quality Analyst  
Air Quality Division  
616-356-0259

cc: Ms. Heidi Hollenbach, DEQ  
cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ