



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 21, 2022

Jeffrey Cavanaugh
Spartan Paperboard Company
P.O. Box 505
Oshtemo, Michigan 49077-0505

SRN: U392105232, Kalamazoo County

Dear Jeffrey Cavanaugh:

VIOLATION NOTICE

On May 18, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Spartan Paperboard Company (facility) located at 8062 Stadium Drive, Kalamazoo, Michigan. The purpose of this inspection was to determine the facility'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
Paperboard Baler	R 336.1201 (Rule 201)	Baler exhaust was did not have appropriate filtration and was exhausted externally. Particulate matter was seen on the ground at exhaust exit location. Facility needs to either install appropriate fabric filters for external ventilation or reroute the exhaust internally into the building to comply with the Rule 285(2)(l)(vi) exemption, or apply for a Permit to Install.

During this inspection, it was noted that Spartan Paperboard Company had installed and commenced operation of unpermitted equipment at this facility. The AQD staff advised the facility on May 18, 2022, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the paperboard baler process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

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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 July 12, 2022 (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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Spartan Paperboard Company 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 the facility. 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,

Monica Brothers

Monica Brothers
Senior Environmental Quality Analyst
Air Quality Division
269-312-2535

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