



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 24, 2022

Janet Brown
Midwest Rubber Company
3525 Rangeline Road
Deckerville, Michigan 48427

SRN: A6444, Sanilac County

Dear Janet Brown:

VIOLATION NOTICE

On March 8, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Midwest Rubber Company located at 3525 Rangeline Road, Deckerville, Michigan. The purpose of this inspection was to determine Midwest Rubber Company'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) numbers 102-19, 259-04A, 387-86A, 567-94B, 375-97B, 136-17, 276-06, 376-97, 383-86, 388-86, 373-97, and 196-87.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	PTI No. 276-06, FGFACILITY, Special Condition (SC) 2.6d-e.	Incomplete HAP emission records
Slush line forming and curing operations using a hot salt solution	PTI No. 376-97, SC 15	VOC content material limit exceedance

The HAP emission records reviewed were concluded to not be acceptable and this is a violation of PTI No. 276-06, FGFACILITY, SC 2.6d-e.

Plastisol used in the slush forming and curing operations that use a hot salt solution were over the 1% VOC content limit by weight. This is a violation of PTI No. 376-97, SC 15.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 14, 2022 (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

Janet Brown
Midwest Rubber Company
Page 2
May 24, 2022

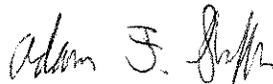
proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Midwest Rubber 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 violations cited above and for the cooperation that was extended to me during my inspection of Midwest Rubber Company. 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,



Adam Shaffer
Environmental Quality Analyst
Air Quality Division
989-225-4789

cc: Mary Ann Dolehanty, EGLE
Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Chris Hare, EGLE