



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 2, 2019

Mr. Kevin Bott
Vertellus Zeeland, LLC
215 North Centennial Street
Zeeland, Michigan 49464

SRN: B2817, Ottawa County

Dear Mr. Bott:

VIOLATION NOTICE

On March 13, 2019, Vertellus staff disclosed information to the Department of Environmental Quality (DEQ), Air Quality Division (AQD), regarding the discarding of records associated with the Air Pollution Control Devices at Vertellus Zeeland, LLC, located at 215 North Centennial Street, Zeeland, Michigan. The information was reviewed in order to determine Vertellus Zeeland, LLC'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 104-09E and 104-09F.

During review of the information, and confirmation with Vertellus Zeeland, LLC, staff verified the following:

Process Description	Rule/Permit Condition Violated	Comments
EUB031	PTI Nos. 104-09E and 104-09F, Special Condition VI.3	Failure to maintain temperature records for Cold Trap #1 and Cold Trap #2.
EUNEWPILOTPLANT	PTI Nos. 104-09E and 104-09F, Special Condition VI.5	Failure to maintain pressure records for the clean room during operation of process equipment.
FGCONSOLIDATED	PTI Nos. 104-09E and 104-09F, Special Condition VI.3	Failure to maintain pressure drop records for the dust collectors.

Vertellus staff informed the AQD that all records pertaining to the air pollution control devices (APCD) associated with all emission units in PTI Nos. 104-09E and 104-09F were discarded and are no longer available. This is the case for all records for the APCDs for the timeframe of January 2018 through January 2019. The conditions of PTI Nos. 104-09E and 104-09F require records to be maintained on file for a period of five years and be made available for review upon request by the AQD Staff.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 23, 2019 (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 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 the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue, Unit 10, Grand Rapids, Michigan 49505 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Vertellus Zeeland, LLC 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. 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,



Kaitlyn DeVries
Environmental Quality Analyst
Air Quality Division
616-558-0552

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ