



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

December 20, 2018

Mr. Brian McFall
Thelamco, Inc.
P.O. Box 456
Benton Harbor, Michigan 49022

SRN: B6608, Berrien County

Dear Mr. McFall:

VIOLATION NOTICE

On December 4, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Thelamco, Inc. (Facility), located at 1202 Territorial Road, Benton Harbor, 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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 597-87A.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGLaminators	Special Condition VI.7 of PTI No. 597-87A.	The thermal oxidizer is equipped with a Honeywell controller that continuously monitors and records combustion temperatures; however, the Facility has not been able to access records of the combustion temperature for quite some time.
FGLaminators and FGFacility	Special Condition V.1 of FGLamintors and V.2 of FGFacility contained in PTI No. 597-87A.	The Facility never submitted a request to the AQD district supervisor to use manufacturer's formulation data for determining volatile organic compound content of the products they use nor have any products been tested using EPA Method 24.

Mr. Brian McFall
Page 2
December 20, 2018

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 25, 2019. 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, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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 the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Matt Deskins
Environmental Quality Analyst
Air Quality Division
269-567-3542

MD:CF

Enclosure

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