



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

July 25, 2018

Mr. Tom Campbell
MedPlast Medical, Inc.
520 Watson SW
Grand Rapids, Michigan 49504

SRN: N0795, Kent County

Dear Mr. Campbell:

VIOLATION NOTICE

On July 5, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of MedPlast Medical, Inc. located at 520 Watson SW, Grand Rapids, Michigan. The purpose of this inspection was to determine MedPlast Medical, 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; the Air Pollution Control Rules; the federal National Emission Standards for Hazardous Air Pollutants for Ethylene Oxide Emissions Standards for Sterilization Facilities found in 40 CFR Part 63, Subpart O; and the conditions of Permit to Install (PTI) number 605-89B.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Sterilization Chamber Vents and/or Aeration Chamber Vents	40 CFR Part 63, Subpart O (40 CFR 63.362)	Failure to maintain a 99 percent emission reduction from the sterilization chamber vents and/or the aeration room vents as required.
EUETOSTERILIZERS	PTI No. 605-89B, EUETOSTERILIZERS, Special Condition 1.5;	Failure to maintain a minimum capture and destruction efficiency of 99.5 percent by weight for Ethylene Oxide as required.

Emissions of Ethylene Oxide from the EUETOSTERILIZERS emission unit are not being adequately captured and controlled.

MedPlast Medical, Inc.'s Grand Rapids facility shall conduct stack testing of the system prior to November 30, 2018 to demonstrate compliance with the permitted emission limit, and to establish new operational parameters.

Additionally, please provide a facility-wide Potential to Emit demonstration. Emissions from the MedPlast Medical, Inc. facility next door should be included or a demonstration to show they are not one stationary source should be provided.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 15, 2018 (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 NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If MedPlast Medical, Inc. 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 MedPlast Medical, Inc. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ