



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHOR
DIRECTOR

May 8, 2018

Mr. John Atkinson
Ventra Ionia Main, LLC
14 North Beardsley Road
Ionia, Michigan 48846

SRN: N0923, Ionia County

Dear Mr. Atkinson:

VIOLATION NOTICE

On April 12, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of Ventra Ionia Main, LLC located at 14 North Beardsley Road, Ionia, Michigan. The purpose of this inspection was to determine Ventra Ionia Main, 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; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 189-90F.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGCRTANKS	PTI No. 189-90F, Special Condition (SC) III.3 40 CFR Part 63, Subpart N	Failure to comply with the maximum surface tension limit of 33 dynes/cm, as measured by a tensiometer.

The chromium tanks, as defined in FGCRTANKS are also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for chromium emissions from hard and decorative chromium electroplating and chromium anodizing tanks. These standards are found in 40 CFR Part 63, Subpart N. Permit to Install No. 189-90F, SC III.3 and the NESHAP have a maximum surface tension limit of 33 dynes/cm as measured by a tensiometer. On two (2) days (January 23, 2018 and February 7, 2018) there were four (4) instances where the surface tension reading exceeded the allowed 33 dynes/cm. Additionally, upon detecting the surface tension exceedances, Ventra should have returned to the required every 4-hour monitoring schedule as required in 40 CFR Part 63, Subpart N (40 CFR 63.343(c)(5)(ii)(C)), but there was no evidence of this in the records.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 29 (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.

In addition to the response requested above, please provide potential to emit (PTE) calculations for the entire facility for particulate matter (PM), volatile organic compounds (VOC), and Hazardous Air Pollutants (HAPS). Information on calculating PTE can be found at <http://www.michigan.gov/deqair>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading.

If Ventra Ionia Main, 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 violation cited above and for the cooperation that was extended to me during my inspection of Ventra Ionia Main, LLC. 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,



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

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Chris Ethridge, DEQ
Mr. Malcolm Mead-O'Brien, DEQ