



September 20, 2021

Mike Kovalchick
Senior Environmental Engineer
Air Quality Division
517-416-5025

Cc:

Scott Miller, EGLE
Chris Ethridge, EGLE
Jenine Camillari, EGLE
Jeff Rathburn, EGLE

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MDEQ - JACKSON

SEP 28 2021

AIR QUALITY DIVISION

Dear Mr. Kovalchick,

This letter is in response to the Violation Notice received from the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), in regards to the announced compliance inspection performed on September 1, 2021.

The root cause of the violations are a result of not realizing that EGLE AQD had not seen actual stack designs for the Tresu Press, and the Comco exhaust previously being directed to the Thermal Oxidizer. Modifying the Comco 14 exhaust (straight to atmosphere) and adding the Tresu exhaust units occurred in the year 2016. This means the duration of this violation is from 2016 to today's present date and currently ongoing.

Our maintenance manager has been working with Dunbar Mechanical, who came to our facility on 9/2/21 and 9/15/21, regarding the immediate repairs of our smoke stacks. We were notified on 9/20/21 that the actuated caps we need for our smoke stacks are not made in the diameter we need. Dunbar Mechanical is currently seeking out fabricators who can custom build actuated caps for our smoke stacks to install when we re-align the caps to emit vertically. I have not been able to get an exact date or quote from Dunbar mechanical, but have been assured they are working diligently on finding a fabricator. We are aware that the EGLE AQD team needs us to submit an exact date of completion for the repairs, and as committed as we are to providing that information, lead times are based on our contractor's abilities to acquire necessary parts and materials. I will submit an update to the EGLE AQD team in no less than 2 weeks from 9/23/21 on our progress. It is my goal to have a more exact date of completion for this work by that time.

Pollard Banknote has recognized a need to have more expertise and focus around environmental compliance. In order to address this gap, Pollard Banknote hired me (start date: June 28, 2021) to take over the environmental program and activities related to our air permit. Having a dedicated Environmental Compliance Specialist whose sole responsibility is to manage concerns such as these, means that a high degree of detail will go into reviewing our air permits to ensure we are compliant.

I will continue to keep you informed of our progress towards correcting these violations, including evidence and photos upon completion of repairs. In the meantime, please feel free to reach out with any questions or concerns.

Thank you,

Dustin Lee
Corporate Environmental Compliance Specialist
775 James L Hart Pkwy
Ypsilanti, MI 48197
e: dlee@pbl.ca
o: (734) 484-6937 Ext 281
c: (734) 431-2307



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 8, 2021

EMAIL and CERTIFIED MAIL

Mr. Darrell Ward
Pollard Banknote Limited
775 James L Hart Pkwy
Ypsilanti, MI 48197

SRN: N1622, Washtenaw County

Dear Mr. Ward:

VIOLATION NOTICE

On September 1, 2021, the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted an announced compliance inspection of Pollard Banknote Limited (Company) located at 775 James L. Hart Parkway, Ypsilanti Michigan. The purpose of this inspection was to determine the 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) and the associated Air Pollution Control Rules, and conditions of Permit to Install (PTI) 89-99K.

During the inspection and subsequent records review, AQD staff determined the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---|---|--|
| EU-TRESU- flexographic printing line. | PTI 89-99K Special Condition VIII. STACK/VENT RESTRICTION(S)- 2. SV_WB-01 & 3, SV_WB-02 | 2 Uncontrolled water-based stacks vent horizontally instead of vertically. (This was also a requirement under recently voided PTI 89-99J.) |
| EU-COMCO | PTI 89-99K Special Condition VIII. STACK/VENT RESTRICTION(S)- 1. SV-COMCO | Stack does not vent unobstructed vertically upward; has rain cap. (This was also a requirement under recently voided PTI 89-99J.) |

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 23, 2021. 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.

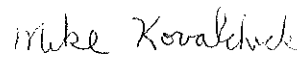
Please submit written response to the EGLE, AQD Jackson District, at 301 East Louis B Glick Highway, Jackson, Michigan 49201, and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

Mr. Darrell Ward
Pollard Banknote Limited
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If the 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 recent inspection. 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,



Mike Kovalchick
Senior Environmental Engineer
Air Quality Division
517-416-5025

cc: Scott Miller, EGLE
Chris Ethridge, EGLE
Jenine Camillari, EGLE
Jeff Rathbun, EGLE