



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

September 30, 2024

Samantha Ontiveros  
Smurfit Westrock  
13 West 4<sup>th</sup> Street  
Holland, Michigan 49423

SRN: N6727, Allegan County

Dear Samantha Ontiveros:

**VIOLATION NOTICE**

On July 30, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Smurfit Westrock located at 504 Eastern Avenue, Allegan, Michigan. The purpose of this inspection was to determine Smurfit Westrock 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) number 225-05F.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGPresses24	Special Condition VI.3	The facility is required to maintain written record of the total combined dimethylethanolamine (DMEA) used in FGPresses24. During a record and emissions calculation review the only materials that were indicated to contribute to DMEA emissions were FSI-1501 (Clean Print) and FSI-1503. Staff found other inks/coatings that are used in FGPresses24 which had DMEA as a component listed in their SDS. These inks/coatings that staff found DMEA as a component in them were FSI-1613 (Transparent White), FSI-10010 (Yellow), and FSI-1503 (Refresh Stabilizing Reducer). The facility does not appear to be accounting for all DMEA emissions in their calculations.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 21, 2024 (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.

Please submit the written response to Cody Yazzie at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or YazzieC@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Smurfit Westrock 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 Smurfit West Rock. 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,



Cody Yazzie  
Environmental Engineer  
Air Quality Division  
269-312-2754

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Monica Brothers, EGLE