



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 9, 2021

Mr. Mark Stancliff
Creative Merchandising Systems, Inc.
4044 Brockton Drive SE
Kentwood, Michigan 49512

SRN: N8194, Kent County

Dear Mr. Stancliff:

VIOLATION NOTICE

On August 26, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Creative Merchandising Systems, Inc. (CMS) located at 4044 Brockton Drive SE, Kentwood, Michigan. The purpose of this inspection was to determine CMS'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) number 6-09.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGSprayBooths	PTI No. 6-09, FGSprayBooths, Special Condition No. VI.3.b	Failure to maintain VOC content of materials
FGSprayBooths	PTI No. 6-09, FGSprayBooths Special Conditions No. VI.3.c&d	Failure to maintain records of VOC emissions

While material usage records were being maintained for each booth, CMS was unable to produce VOC content and emission records as required by PTI No. 6-09. This is a similar deficiency as what was documented and cited as a violation following a 2016 AQD compliance inspection.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 30, 2021 (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.

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Please submit the written response to EGLE, 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 EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If CMS 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 CMS. 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: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olague, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE