



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 10, 2020

Ms. Shelly Maciejewski
Clarios APS Production, LLC
70 West 48th Street
Holland, Michigan 49423

SRN: P0194, Allegan County

Dear Ms. Maciejewski:

VIOLATION NOTICE

On July 30, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Clarios APS Production, LLC located at 70 West 48th Street, Holland, Michigan. The purpose of this inspection was to determine Clarios APS Production, LLC 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 4-14A;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGDRYMATERIALS	Special Condition VI.2	Facility was not maintaining record of Daily Pressure Drop Reading across dust collector
FGDRYMATERIALS	Special Condition VI.3	Facility was not maintaining record of visible emission Readings Once per calendar month that unit is operated.
EUPILOT	Rule 336.1201(3)	Not maintaining records of RTO for a period of five years. Staff requested records of RTO combustion temperature for 2019 that the facility was unable to produce.
EUCOATING	Special Condition VI.2	Facility did not have record of both the scrubber make-up water flow rate and recirculation water flow rate of the EUCOATING scrubber on a calendar bay basis, when scrubber is operation.

The conditions of PTI number 4-14A require records of daily pressure drop readings across the dust collector, monthly visible emission observations, and both the scrubber

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make-up water flow rate and recirculation water flow rate were unable to produce maintenance records.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 1, 2020 (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 EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Clarios APS Production, 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 violations cited above and for the cooperation that was extended to me during my inspection of Clarios APS Production, LLC. 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,



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

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE