



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

May 15, 2023

Kevin DeGraves
Andronaco Industries
4855 Broadmoor Avenue SE
Kentwood, Michigan 49512

SRN: P0361, Kent County

Dear Kevin DeGraves:

VIOLATION NOTICE

On April 6, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Andronaco Industries located at 4855 Broadmoor Avenue SE, Kentwood, Michigan. The purpose of this inspection was to determine Andronaco Industries' 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 109-13.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Compression Molding	PTI No. 109-13, FGCOMP MOLDING, Special Condition II.1	Exceedance of styrene content limit.
Compression Molding	PTI No. 109-13, FGCOMP MOLDING, Special Condition VI.3a-e	Failure to calculate emissions of VOC and acetone.

During the inspection, AQD found that the recordkeeping shows a styrene content of all materials above the permit limit of 15%, and the spreadsheet provided does not contain Volatile Organic Compound (VOC) and acetone emissions calculations, as required. These are violations of PTI No. 109-13, Special Conditions II.1 and VI.3a-e.

In addition to addressing the violations noted above, the AQD requests that Andronaco Industries conduct a facility-wide inventory of equipment and identify the permitted or exempt status of each.

There are ovens of various sizes that are being used to sinter polytetrafluoroethylene (PTFE) and other plastics that are not permitted. Be advised, Rule 201 of the administrative rules promulgated under Act 451 requires that an air use permit to install (PTI) be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

However, certain processes and process equipment may be exempt from obtaining a PTI. Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- A description of all the exempt process or process equipment at the facility, including the date of installation.
- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the stationary source. Information on calculating PTE can be found at: <https://www.michigan.gov/egle/about/organization/air-quality/air-permits/new-source-review/potential-to-emit>.

Finally, it is noted that Plant 3, SRN N5535, provides materials for products made at this facility (Plant 1). AQD requests that Andronaco Industries conduct a Stationary Source Determination to identify whether the buildings identified as Plant 1, Plant 2 and Plant 3 are one stationary source. Information on AQD Policy and Procedure AQD-011 Stationary Source Determinations can be found at: <https://www.michigan.gov/-/media/Project/Websites/egle/Documents/Policies-Procedures/AQD/aqd-011>. Please include this information within 30 days of the date of this letter, along with the Rule 278 and PTE requests above.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 5, 2023 (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.

Kevin DeGraves
Andronaco Industries
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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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Andronaco Industries 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 Andronaco Industries. 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: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE