



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



Heidi Grether  
DIRECTOR

March 3, 2017

Mr. Matt Zomberg, Operations Manager  
American Rack Company  
4910 Kraft Avenue SE  
Cascade Township, Michigan 49512

SRN: P0384, Kent County

Dear Mr. Zomberg:

**VIOLATION NOTICE**

On February 28, 2017 the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received emissions test data for American Rack Company (ARC) located at 4910 Kraft Avenue SE in Cascade Township, Michigan. The report and test data were used to determine ARC'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 administrative rules; and Permit to Install (PTI) No. 151-12.

Based on the review of the company's records and test data, staff verified:

Process Description	Rule/Permit Condition Violated	Comments
Plastisol Burn-off Oven (EU-BURNOFF)	PTI No. 151-12, EU-BURNOFF, Special Condition I.1	Based on the test results, hydrogen chloride (HCl) emissions were 25.5 pounds per hour which is above the permit limit of 16.33 pounds per hour.
Individual hazardous air pollutant (HAP) emissions (FGFACILITY)	PTI No. 151-12, FGFACILITY, Special Condition I.1	Based on the test results and operating data, HCl emissions have exceeded the 9.0 ton per year permit limit. This limit restricts the facility from being a major source of HAPs.
FGFACILITY	Rule 210	Failure to obtain a Renewable Operating Permit (ROP). Under Rule 210(5), an administratively complete ROP should be submitted not more than 12 months after the stationary source exceeds the major source threshold of 10 tons per year for an individual HAP.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **March 24, 2017** (which is 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.

Be advised, notwithstanding your response to the preceding violations, the Air Quality Division may initiate further enforcement action to address violations of state and federal Air Acts, rules and regulations.

If American Rack 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. 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,



David L. Morgan  
Environmental Quality Specialist  
Air Quality Division  
616-356-0009

cc: Ms. Heidi Hollenbach, DEQ  
cc/via email: Mr. Donald Bauer, ARC  
Mr. Todd Oskroba, ARC  
Mr. Kyle Faulman, ARC  
Ms. Lynn Fiedler, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ