



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

January 31, 2023

Ted Jacob, President
Thermaseal Inc.
141 Peyerk Court
Romeo, MI 48065

SRN: P1198, Macomb County

Dear Ted Jacob:

VIOLATION NOTICE

On January 10, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Thermaseal, Inc. located at 141 Peyerk Court, Romeo, Michigan. The purpose of this inspection was to determine Thermaseal'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 58-22.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPRINTINGLABELS Rotogravure printing line	PTI No. 58-22 Section IV Special Condition 2	Thermaseal Inc. operated EUPRINTINGLABELS without installing, maintaining, and operating the thermal oxidizer in a satisfactory manner.
EUPRINTINGLABELS Rotogravure printing line	PTI No. 58-22 Section IV Special Condition 3	Thermaseal Inc. failed to calibrate, maintain, and operate the continuous temperature monitoring device in the thermal oxidizer combustion chamber.
EUPRINTINGLABELS Rotogravure printing line	PTI No. 58-22 Section IV Special Condition 4	Thermaseal Inc. operated EUPRINTINGLABELS without installing, maintaining, and operating a non-fugitive enclosure for the process.

<p>EUPRINTINGLABELS Rotogravure printing line</p>	<p>PTI No. 58-22 Section III Special Condition 3</p>	<p>Thermaseal Inc. operated EUPRINTINGLABELS without implementing, submitting, and maintaining a malfunction abatement plan within 60 days of beginning trial operation.</p>
<p>EUPRINTINGLABELS Rotogravure printing line</p>	<p>PTI No. 58-22 Section V Special Condition 1</p>	<p>Thermaseal Inc. did not determine the VOC content, water content, and density of coating materials using an EPA federal reference Test Method 24. Thermaseal did not obtain approval from the AQD district supervisor to use manufacturer's formulation data.</p>
<p>EUPRINTINGLABELS Rotogravure printing line</p>	<p>PTI No. 58-22 Section V Special Condition 2</p>	<p>Thermaseal Inc. failed to perform a destruction efficiency test on the thermal oxidizer within 180 days of permit issuance.</p>
<p>EUPRINTINGLABELS Rotogravure printing line</p>	<p>PTI No. 58-22 Section V Special Condition 3</p>	<p>Thermaseal Inc failed to verify the direction of air flow of the non-fugitive enclosure is into the enclosure on a semi-annual basis.</p>
<p>EUPRINTINGLABELS Rotogravure printing line</p>	<p>PTI No. 58-22 Section VI Special Condition 4</p>	<p>Thermaseal failed to maintain records of the thermal oxidizer combustion chamber temperature on a continuous basis.</p>
<p>EUPRINTINGLABELS Rotogravure printing line</p>	<p>PTI No. 58-22 Section VI Special Condition 5</p>	<p>Thermaseal Inc. failed to keep records of the test results verifying the air flow direction is into the non-fugitive enclosure on a semi-annual basis.</p>

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 21, 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Thermaseal 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 Thermaseal. 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,



Adam Bogner
Environmental Engineer
Air Quality Division
586-854-1517

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE