



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

June 5, 2017

Mr. Kyle GeBraad
American Seating Company
801 Broadway NW
Grand Rapids, Michigan 49504

SRN: B1713, Kent County

Dear Mr. GeBraad:

VIOLATION NOTICE

On March 28, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of American Seating Company located at 801 Broadway NW, Grand Rapids, Michigan. The purpose of this inspection was to determine American Seating Company'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 202-01.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGISADHESIVE	PTI No. 202-01, Special Condition (SC) 1.6	Improper determination of VOC content
	PTI No. 202-01, SC 1.8 a-e & 1.10 a, d-e	Incomplete records
FGFACILITY	PTI No. 202-01, SC 3.2 & 3.3	Improper determination of HAP/VOC content
	PTI No. 202-01, SC 3.5 a-e & 3.7 a, c-e	Incomplete records

During this inspection, it was concluded that American Seating Company was not utilizing Test Method 24 and/or formulation data sheets to determine VOC content for each applicable material used on site. Also, it was concluded that American Seating Company was not utilizing formulation data sheets to determine the HAP content for each applicable material used on site.

Additionally, during the course of this inspection, American Seating Company was unable to provide the following records:

FGISADHESIVES:

- Gallons (with water) of each adhesive coating material used.
- VOC content (minus water and with water) of each adhesive coating as applied.
- VOC monthly and 12-month rolling time period emissions.
- Hours of operation.
- Gallons (with water) of each acetone containing material used.
- Acetone monthly and 12-month rolling time period emissions.

FGFACILITY

- Gallons (with water) of each adhesive coating or material used.
- VOC content (minus water and with water) of each adhesive coating or material as applied.
- VOC monthly and 12-month total rolling time period emissions.
- Hours of operations.
- Gallons or pounds of each material used.
- HAP content, in pounds per gallon or pounds per pound, of each material used.
- Individual and aggregate HAP monthly and 12-month total rolling time period emissions.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 26, 2017 (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.

As part of the response, American Seating Company needs to resubmit a corrected version of their 2016 MAERS Report that more accurately identifies their reported emissions.

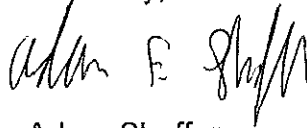
During the course of the inspection of American Seating Company, several attempts were made to verify the specific size of the one baghouse in operation on site. American Seating Company is being requested to provide the specific size of the baghouse. Also, American Seating Company should provide additional information regarding the zirconium wash system to determine if this piece of equipment is potentially exempt from permitting.

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If American Seating 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 and for the cooperation that was extended to me during my inspection of American Seating Company. 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 Shaffer
Environmental Quality Analyst
Air Quality Division
616-356-0767

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ