



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



DAN WYANT
DIRECTOR

March 19, 2014

CERTIFIED MAIL 7010 0290 0000 3734 2460
RETURN RECEIPT REQUESTED

Ms. Kristy LaGrange, Health & Safety Coordinator
Martinrea International, Inc
Bishop Circle Assembly
10501 Michigan State Rd., M-52
Manchester, MI 48158

SRN: B3658, Washtenaw County

Dear Ms. LaGrange:

VIOLATION NOTICE

On January 31, 2014 and February 6, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an initial inspection, and a follow-up inspection of your Bishop Circle Assembly operations located at 10501 M-52, Manchester, Michigan. The purpose of this inspection was to determine your status of 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), and the air pollution control administrative rules.

This inspection was prompted by your inquiry to AQD concerning any air quality permit requirements that may apply to your operations, following your recent ISO 14001-type environmental audit training contracted by your company.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
One (1) rubber extrusion and curing process, involving multiple extrusion lines, two (2) curing ovens, and two (2) curing autoclaves. The rubber curing process could possibly be described as one (1) or more separate processes that were installed as part of one (1) discreet project.	Rule 201.	The rubber extrusion and curing process appears to have been relocated from another location to the Bishop Circle Assembly location approximately around 2006, without first obtaining an approved permit to install as required under Rule 201.

In addition to the rubber extrusion and curing process, you operate several other processes which are exempt from the requirement to obtain an approved Rule 201 permit to install as they comply with one of the permit exemptions described in Rule 280-290 :

1. Several plastic extruders comply with the Rule 201 permit exemption described in Rule 286(b).
2. The Besting solution and adhesion coating processes comply with the Rule 201 permit exemption described in Rule 287(c).
3. The Nylon forming process which uses a heated bath of polyethylene glycol to thermoform nylon-core rubber tubing complies with the Rule 201 permit exemption described in Rule 286(d).

Preliminary work performed by your consultant, Derenzo and Associates, Inc. appears to establish that these permit-exempt processes are not excluded from using the exemptions specified in Rules 280 through 290, as described in Rule 278.

During this inspection, it was noted that you had installed an unpermitted process at this facility; the rubber extrusion and curing process. The AQD staff advised you on February 6, 2014, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the rubber extrusion and curing process. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP

Be advised that Rule 201 requires that a permit 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.

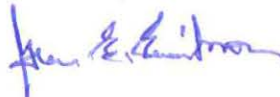
Your consultant has described how, based upon a review of available information, regulated air pollutant emissions from the rubber extrusion and curing process are expected to be relatively low, and may be less than the specific requirements of the Rule 290 permit to install exemption, however, the actual emission rate recordkeeping would be extensive, and onerous. Derenzo and Associates' recommendation is to apply for a permit to install for the rubber extrusion and curing process.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 9, 2014. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

If you believe 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 violation cited above and for the cooperation that was extended to me during my inspections of January 31, 2014 and February 6, 2014. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Glen E. Erickson
Senior Environmental Quality Analyst
Air Quality Division
517-780-7851.

cc: Mr. Scott Miller, DEQ
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ

