



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 29, 2018

Mr. Milco Marchetti
Uniband USA, LLC
2555 Oak Industrial Drive NE
Grand Rapids, Michigan 49505

SRN: B3718, Kent County

Dear Mr. Marchetti:

VIOLATION NOTICE

On August 14, 2018, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of Uniband USA, LLC located at 2555 Oak Industrial Drive NE in Grand Rapids, Michigan. The purpose of this inspection was to determine Uniband USA, LLC'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; and the Air Pollution Control Rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Conveyor Belt Manufacturing line (knife coating, three infrared ovens and associated exhaust stacks)	Rule 201	The process does not have an air use permit to install. The process does not currently meet the criteria for exemption under Rule 290.

During the inspection, it was noted that the process was originally installed under the Rule 290 permit exemption as volatile organic compound (VOC) emissions were expected to be low. However, the company is not maintaining monthly records to support a Rule 290 compliance demonstration. In addition, particulate emissions (in the form of oil mist or smoke) have not been quantified or evaluated relative to the Rule 290 thresholds. The company is emitting Di-isononyl phthalate (DINP) oil mist without a permit and DINP oil was observed pooled on the roof as well as emitted as a visible emission in quantities that may have exceeded opacity limits in Rule 301.

A program for compliance may include a completed Permit to Install application for the conveyor belt manufacturing process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right-hand side of the page).

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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.

“A person shall not install...any process or process equipment, including control equipment pertaining thereto, which may emit an air contaminant, unless a permit to install which authorizes such action is issued by the Department.”

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 19, 2018 (which coincides with 21 calendar days from the date of this letter). 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 reoccurrence.

Please submit the written response to the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Uniband USA, LLC 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 violation cited above and for the cooperation that was extended to me during my inspection of Uniband USA, LLC. 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,



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

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ