

## STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

August 31, 2017

Mr. Tim Hula H.B. Fuller Company 2727 Kinney Avenue NW Grand Rapids, Michigan 49534

SRN: B5918, Kent County

Dear Mr. Hula:

## **VIOLATION NOTICE**

On June 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division, conducted an inspection of H.B. Fuller Company located at 2727 Kinney Avenue NW, Grand Rapids, Michigan. The purpose of this inspection was to determine H.B. Fuller 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 275-04C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUSOLVCEM EUHOCKMEYERPASTE EUMHTMIXER FGPREPOLYMER2 FGFACILITY	PTI No. 275-04C	Incomplete records
EUMHTMIXER	PTI No. 275-04C, Special Condition VI.4.e	Temperature exceedance

At the time of the inspection, records for the following emission units were concluded to be incomplete: EUSOLVCEM, EUHOCKMEYERPASTE, EUMHTMIXER, FGPREPOLYMER2, and FGFACILITY.

Condenser cooling water outlet temperatures reviewed for EUMHTMIXER identified an exceedance of 80°F on April 22, 2017 for approximately 100 minutes with the temperatures reaching a maximum of 99°F. No additional documentation on this exceedance was identified.

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

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Please include in the response the following:

- An updated Preventative Maintenance / Malfunction Abatement Plan for the following emission units / flexible groups: EUSOLVCEM, EUMHTMIXER, FGPREPOLYMER2, and FGPARTICULATE.
- H.B. Fuller Company should resubmit their 2016 MAERS Report by September 21, 2017.
- H.B. Fuller Company needs to provide applicable exemptions for the following pieces of equipment that were observed on site at the time of the inspection:
  - The mini dust collector that was observed to be used in association with EUMHTMIXER. (Additionally, H.B. Fuller Company needs to provide the size of this dust collector.)
  - o The three-drum one vessel mixing unit identified adjacent to the EUMHTMIXER.
  - o The tanks identified during the inspection in the southern tank farm.
  - The eight ovens observed on site used to melt raw materials.
  - o A repacking area where finished products are poured into smaller containers.

If H.B. Fuller 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 H.B. Fuller 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