



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



KEITH CREAGH  
DIRECTOR

January 22, 2016

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Steven Mohnke  
ETM Enterprises, Incorporated  
920 North Clinton Street  
Grand Ledge, Michigan 48837

SRN: B6202, Eaton County

Dear Mr. Mohnke:

**VIOLATION NOTICE**

On December 15, 2015 and January 7, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of ETM Enterprises, Incorporated located at 920 North Clinton Street, Grand Ledge. The purpose of this inspection was to determine your facility'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 administrative rules, the conditions of Permit to Install (PTI) number 50-15, 551-77, and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B6202-2015.

During the inspection, staff observed the following:

| Process Description            | Rule/Permit Condition Violated              | Comments   |
|--------------------------------|---|--|
| EUROUTING<br>(FGSANDGRINDROUT) | R336.1910                                   | Dust collectors were not operating during sanding process. |
| FGPRESSANDMIXING               | MI-ROP-B6202-2015<br>Special Condition VI.7 | Emission factor being used is insufficient.                |

On December 15, 2015, the AQD staff observed operation of EUROUTING while two of the installed dust collectors were off line. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

During the records review of FGPRESSANDMIXING, it was found that the emission factor used for calculating styrene emissions is incorrect. The emission factor of 0.007 is believed to be reporting emissions less than actual dependent on the resin styrene content. This equates to a 2 percent loss of a resin containing 35 percent styrene. The permittee is allowed to use a resin containing up to 40 percent styrene per special condition III.1. Should you use a resin containing greater than 35 percent styrene, the emission factor is inaccurate.

This constitutes a violation of MI-ROP-B6202-2015, Special Condition VI.7 which states: Calculations shall be completed in a manner and format acceptable to the AQD District Supervisor.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 19, 2016. 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.

If ETM Enterprises, Incorporated 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 on December 15, 2015 and January 7, 2016. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Nathan Hude  
Environmental Quality Analyst  
Air Quality Division  
517-284-6779

NHH:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Heidi Hollanbach, DEQ  
Mr. Tom Hess, DEQ  
Mr. Brad Myott, DEQ