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February 25, 2020

EGLE, AQD, Grand Rapids District
350 Ottawa Avenue NW
Unit 10
Grand Rapids, MI 49503



Dear Mr. Shaffer,

We are in receipt of the Violation Notice, dated February 6, 2020 ("Violation Notice"), issued to QG Printing II LLC's facility located at 1321 Van Deirse Street in Greenville, Michigan 48838 ("Quad"). We are also in receipt of the report, dated December 23, 2019, concerning the same inspection of the same facility ("Report"). This communication constitutes Quad's response to the Violation Notice.

The Violation Notice alleges that Quad violated PTI No. 598-96, SC 20, which requires that "Applicant shall not operate the printing lines unless the catalytic incinerator is heated to its minimum operating temperature of 650 degrees (monitored at the catalyst bed inlet) and is operating properly. Proper operation is defined as a minimum VOC destruction efficiency of 95% (by weight) for press lines 450 – A, B, C and 450 – De, E, F; and 85% (by weight) for press lines 300, 400 and 500." As a point of clarification, the 300 and 500 press lines have been decommissioned. The Violation Notice specifically alleges that "[i]t was determined during an October 2019 maintenance check that the conversion efficiency of the catalyst for the catalytic oxidizer that controls EUABC was at <50%, indicating the catalytic oxidizer is not operating properly."

The October 2019 Catalyst Analysis emphasizes that the test results do not reflect actual field performance. The report states, "Please note that test conditions are not the same as field conditions, but are in fact, more rigorous. Typically field performance is better than laboratory performance." The report further states that, "[i]t is possible that it could work acceptably in the field, but the operating temperature would most likely need to be quite high." Nonetheless, prior to the November 20, 2019 Air Quality Division inspection, Quad planned the replacement of the oxidizer at some time during the first quarter of 2020. Quad communicated its plan to Mr. Shaffer during his inspection, and Mr. Shaffer stated in his Report that, "[t]his was concluded to be acceptable, and it was stated to QG staff the importance of completing the replacement of the CO as soon as possible." Report, p. 3. Mr. Shaffer ultimately concluded that "QG appears to be in compliance with PTI No. 598-96 and applicable air pollution control rules." Report, p. 4.

Following the November 20, 2019 Air Quality Division inspection, Quad began arranging for the actual delivery and installation of the new catalytic oxidizer. During this process, we contacted AIS, which is a third-party contractor that will install the catalytic oxidizer. It was then that we first learned that AIS could not access the facility during the first quarter of this year because of the seasonal weight restrictions (or frost laws) in effect in Montcalm County. Because of the frost laws, AIS was not able to schedule the installation of the catalytic oxidizer until June 2020. We have, however, been working with AIS to secure an earlier date. We have now confirmed with AIS that the direct replacement catalytic oxidizer will be installed between April 13 and 17, 2020.

Because we will be replacing the catalytic oxidizer as soon as possible, and the two-week delay is the result of Montcalm County's frost laws and not any dilatory actions by Quad, we respectfully request that the Violation Notice be withdrawn and the Air Quality Division readopt its conclusion contained in the December 23, 2019 report.

Please let us know if you have any questions or would like any additional information.

Regards,

A handwritten signature in black ink, appearing to read "Natalie Hahlen", with a long, sweeping horizontal line extending to the right.

Natalie Hahlen
Director of EHS

Quad/Graphics, Inc.

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E-mail: njhahlen@quad.com

cc : Ms. Jenine Camilleri, Enforcement Unit Supervisor, EGLE
Dan Nichols, QG Printing