



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

July 23, 2018

Mr. Bart Leonard
Welch's Food, Inc.
400 Walker Street
Lawton, Michigan 49065

SRN: N1461, Van Buren County

Dear Mr. Leonard:

VIOLATION NOTICE

On July 12, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Welch's Food, Inc. (Facility), located at 400 Walker Street, Lawton, Michigan. The purpose of this inspection was to determine the 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 Air Pollution Control Rules; and Permit to Install No. 713-86C.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUADHESIVES	Rule 290(2)(a)(i)	The records submitted by the Facility to show EUADHESIVES compliance with Rule 290 are not complete. Only VOC are currently being tracked and not all noncarcinogenic VOC and noncarcinogenic materials in the adhesive.

During this inspection, the Facility produced emission records.

The recordkeeping intended to show compliance with EUADHESIVES under exemption Rule 290(2)(a)(i) was not sufficient to show compliance. Rule 290 specifically requires tracking "any emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials that are listed in R336.122(f) as not contributing

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appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively". Current records are only tracking volatile organic compounds (VOC) and not noncarcinogenic materials. This should be updated and new records submitted to the DEQ.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 13, 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, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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 the Facility. If you have any questions regarding the violation or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
269-910-2109

AC:CF

Enclosure

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