



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



DAN WYANT
DIRECTOR

February 19, 2014

CERTIFIED MAIL – 7010 0290 0000 3734 2804
RETURN RECEIPT REQUESTED

Mr. Darrell Ward
Director of Quality, Safety, & Environment
Pollard Banknote Limited
775 James L. Hart Parkway
Ypsilanti, Michigan 48197

SRN: N1622, Washtenaw County

Dear Mr. Ward:

VIOLATION NOTICE

On January 22, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Pollard Banknote Limited located at 775 James L. Hart Parkway, Ypsilanti, Michigan, 48197. The purpose of this inspection was to determine your 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 and the conditions of Permit to Install (PTI) number 89-99C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
14-Station Comco Flexographic Printing Press, with Permanent Total Enclosure (PTE), and Catalytic Oxidizer control (CTO)	PTI No. 88-89C, Special Condition No. FG-PRINTING, V., 1. TESTING/SAMPLING which reads: The permittee shall send a catalyst core sample to the manufacturer or a third party for catalyst activity testing at least once every 12 months with the exception that the frequency shall be increased to at least once every 6 months after the catalyst has been in service for six years, or if the annual test result indicates 96.0 percent activity or less at 600 degrees F.	Records provided by the company during the AQD inspection of 1-22-14, and the follow-up phone conversation with AQD on 2-11-14 show that the last 3 catalyst core sampling events have been at intervals of 8-9 months; greater than the required 6 month interval. In fact, the catalyst analysis report prepared by MEGTEC Systems for 2 of the last 3 sampling events was not submitted to the company for 7

	<p>Immediately upon removal, any catalyst core sample shall be replaced in the catalyst bed with a fresh catalyst replacement core according to the supplier's recommended procedures. If any catalyst core sample test results indicate that the catalyst activity is 95 percent or less at 600 degrees F, the permittee shall notify the AQD District Supervisor in writing within 30 days of receiving the test results. Within 60 days of receiving test results that indicate catalyst activity is less than or equal to 95 percent, the permittee shall either replace the catalyst or verify the VOC destruction efficiency for the EU-COMCO catalytic oxidizer, by testing at owner's expense, in accordance with Department requirements. No less than 30 days prior to testing, the permittee shall submit a complete test plan to the AQD. The AQD must approve the final plan prior to testing. Verification of VOC destruction efficiency includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test.</p>	<p>months from the date of sample receipt at the lab.</p> <p>The catalyst analysis for the core sample submitted to the lab on 4-23-13 reports a catalyst destruction efficiency for the "TOP" section of the control device of 67.3 % @ 600 degrees F.</p> <p>As of the date of the inspection on 1-22-14, the test result showing catalyst activity to be less than 95 % was not reported to AQD within 60 days of receiving test results: in this case, 61 days.</p> <p>The paragraphs above describe violation(s) of Special Condition No. V., 1.</p>
	<p>Special Condition No. IV., 2. DESIGN/EQUIPMENT PARAMETERS, which reads:</p> <p>The applicant shall not operate EU-COMCO unless</p>	<p>The catalyst core sample that was submitted to the lab on 4-23-13, which was reported to have a "TOP" catalyst section "conversion efficiency" of 67.3 % @ 600 degree F</p>

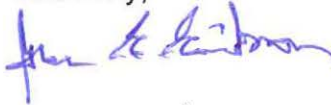
	the catalytic oxidizer is installed and operating properly. Proper operation is defined as a minimum VOC destruction efficiency of 95 percent, a minimum inlet operating temperature of 600 degree F, and a maximum space velocity of 50,000 inverse hours.	may represent a violation of Special Condition No. IV, 2.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 12, 2014. 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 you believe 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 AQD staff during the inspection of January 22, 2014. 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,



Glen E. Erickson
Senior Environmental Quality Analyst
Air Quality Division
517-780-7851

cc: Scott Miller, DEQ, Jackson District AQD Supervisor
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ