



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

September 9, 2016

Mr. Scott Ryan, Assistant General Counsel
Gentex Corporation
600 North Centennial Street
Zeeland, Michigan 49464

SRN: N1888, Ottawa County

Dear Mr. Ryan:

VIOLATION NOTICE

On June 15, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Gentex Corporation located at 600 North Centennial Street, Zeeland, Michigan. The purpose of this inspection was to determine Gentex Corporation'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 Renewable Operating Permit (ROP) number MI-ROP-N1888-2016.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Manufacture of automotive mirrors and parts	MI-ROP-N1888-2016, FG-RULE290, Special Condition VI.1 &2	Failure to maintain records sufficient to demonstrate compliance with Rule 290
Manufacture of automotive mirrors and parts	Rule 201	Failure to maintain records sufficient to demonstrate compliance with Rule 290

Following the inspection, a detailed recordkeeping review revealed that Gentex Corporation was not keeping records consistent with the requirements of Rule 290. Additionally, numerous emission units have been installed under exemptions without sufficient demonstration that Rule 278 has been met. A Permit to Install may be required.

A Rule 278a demonstration was received on August 8, 2016. This demonstration was not sufficient and was missing required information. The information must identify the specific exemption being used by the process or process equipment as required by Rule 278a(b). The evaluation and equipment list also did not appear to include the new North Riley Campus. To clarify, the submittal must cover all emission units at the

Mr. Scott Ryan
Gentex Corporation
Page 2
September 9, 2016

stationary source, identified by the SRN of N1888. Please note that pursuant to Rule 278, an installation is not evaluated on a calendar year basis, but is evaluated for each project based on whether the process/process equipment installations are concurrent and related.

As discussed, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. A deadline for this information of September 23, 2016 has been agreed upon. Information on calculating PTE can be found at the following website:

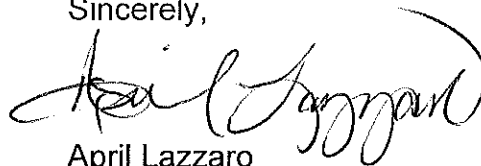
<http://www.michigan.gov//deq/0,4561,7-135-3310---,00.html>

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 30, 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 Gentex Corporation 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 Gentex Corporation. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-356-0248

cc: Ms. Heidi Hollenbach DEQ
cc/via e-mail: Mr. Gary Engerson, Gentex Corporation
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ