



STATE OF MICHIGAN  
 DEPARTMENT OF  
 ENVIRONMENT, GREAT LAKES, AND ENERGY  
 KALAMAZOO DISTRICT OFFICE



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

June 6, 2019

Mr. Peter VanNiekerc  
 TRMI, Inc.  
 100 Hill Brady Road  
 Battle Creek, Michigan 49037

SRN: N2354, Calhoun County

Dear Mr. VanNiekerc:

**VIOLATION NOTICE**

On May 24, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of TRMI Inc. located at 100 Hill Brady Road, Battle Creek, 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 the conditions of Permit to Install (PTI) number 158-11B.

During the inspection, staff observed the following:

| Process Description                                 | Rule/Permit Condition Violated | Comments  |
|---|--------------------------------|---|
| Toluene and Isopropyl Alcohol (IPA) Squeeze Bottles | Rule 336.1290 PTI Exemptions   | Facility was using IPA and toluene squeeze bottles throughout the facility under exemption 290, emission units with limited emissions. In 2019, toluene exceeded the 1000 pound (lbs)/month limit in March 2019, emitting 1439.49 lbs of VOC. IPA exceeded the 1000 lbs/month limit in January, February, March, and April emitting 1426.7 lbs, 1426.7 lbs, 1783.38 lbs, and 1426.7 lbs respectively. |

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 27, 2019 (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 EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Battle Creek, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

Sincerely,



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

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Rex Lane, EGLE  
Ms. Emily Frederick, TRMI, Inc.