



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

June 7, 2016

Mr. Chris Carpenter
Michigan Rubber Products
1200 Eighth Street
Cadillac, MI 49601

SRN: N2588, Wexford County

Dear Mr. Carpenter:

VIOLATION NOTICE

On January 14, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Michigan Rubber Products located at 1200 Eighth Ave., Cadillac, Michigan. The purpose of this inspection was to determine Michigan Rubber Products 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 495-97A.

At the time of the inspection, Michigan Rubber Products was not maintaining emission calculation records up to date and the extended time period between the inspection date and this Violation Notice was due to the need to produce these records and provide them to the AQD. PTI 495-97A requires maintenance of rubber production records but not emission calculations. Ongoing maintenance of emission calculations is important to ensure you are in compliance with your emission limits each month.

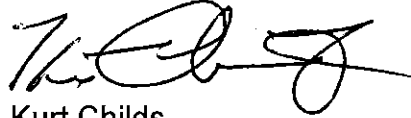
The records that were provided following the inspection demonstrate that actual emissions of Particulate Matter (PM) from the EUMICROWAVE and EUHOTAIRCURE process equipment are greater than the PTI emission limits of 0.121 lb/hr and 0.24 ton per year for most months over the last 12 month period. These are violations of the PTI emission limits.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 28, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include 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 Michigan Rubber Products 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 Michigan Rubber Products. 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,

A handwritten signature in black ink, appearing to read 'Kurt Childs', with a stylized flourish at the end.

Kurt Childs
Environmental Quality Analyst
Air Quality Division
231-876-4411

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Ms. Janis Ransom, DEQ