

10FEB20

Cody Yazzie
Environmental Engineer
EGLE, AQD, Kalamazoo District
7953 Adobe Road
Kalamazoo, MI 49009



Mr. Yazzie,

I would like to thank you for your December 18th visit of our facility. It was very informative. Unfortunately, we discovered during your visit that we were not reporting our usage correctly. You noted that in February 2019, February 2018 and August of 2017 we were in violation of reporting more than 1,000 pounds of VOC for the given month.

Our Martin facility has self-reported since we began printing in this facility. Our understanding was that we could not average over 1,000 pounds of VOC for a month and for as far back as we have records (2013) we never went above an average of 825 pounds per month in a calendar year. Our “usage” has always been based on what we purchased for a given month, minus returns or recycling.

The other area of note on your inspection was that we did not have records for the individual components of our inks and solvents showing evaluation for toxic air contaminants. I have worked with our supplier and reviewed each item and its’ ingredients and have now changed our recording documentation to include this. I reviewed all of 2019 usage to ensure we did not go above any threshold and we are well under acceptable limits, using only 1.26 pounds of hazardous air pollutants all year.

Now that we have the appropriate regulations, requirements and format for reporting, there will be no issues in the future. These regulations along with relevant data on the items we use and their ingredients are in a binder that we will review and update monthly for our usage. We will review individual items annually or when first ordered and added to our inventory. We are confident that we will not exceed our monthly thresholds in the future now that we fully understand the requirements.

Sincerely,

Kenneth Jamison
Quality Manager

cc: Jenine Camilleri, EGLE