



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 22, 2015

Tom Starin, EH&S Manager
Multi Packaging Solutions
5800 West Grand River Avenue
Lansing, MI 48906

SRN: N3531, Clinton County

Dear Mr. Starin:

VIOLATION NOTICE

On July 8, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Multi Packaging Solutions (MPS) located at 5800 West Grand River Avenue, Lansing. The purpose of this inspection was to determine MPS' 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 170-79H.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-Packaging 26	Rule 201 and Rule 287(c) recordkeeping	Unit was operating under Rule 287(c), but did not meet the 200 gallon (minus water) exemption condition for October and December 2013, and April and August 2014.

During this inspection and after review of recordkeeping, it was noted that MPS had commenced operation of unpermitted equipment at this facility which did not meet the Rule 287(c) conditional exemption. The AQD staff advised MPS on July 8, 2015, that this is a violation of Act 451, Rule 201.

A program for compliance shall include a completed PTI application for the EU-Packaging 26 process equipment. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 13, 2015. 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.

If MPS believes the above observations or statements are inaccurate or do not constitute a violation 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 MPS. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-284-6636

ML:TG

cc: Mr. Brad Myott, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ