



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 19, 2019

Mr. Karl Adams
R.L. Adams Plastics, Inc.
5955 Crossroads Commerce Parkway SW
Wyoming, Michigan 49519

SRN: N7221, Kent County

Dear Mr. Adams:

VIOLATION NOTICE

On February 20, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of R.L. Adams Plastics, Inc. located at 5955 Crossroads Commerce Parkway SW, Wyoming, Michigan. The purpose of this inspection was to determine R.L. Adams Plastics, Inc.'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-N7221-2015a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGPROD®RIND	MI-ROP-N7221-2015a, FGPROD®RIND, Special Condition (SC) VI.13	Failure to record daily pressure drop readings
FGPROD®RIND	MI-ROP-N7221-2015a, FGPROD®RIND, SC VIII.1	Incorrect stack dimension

Upon review of requested daily pressure drop reading records for the five dust collectors, numerous daily records were missing from January 2018 through January 2019. This is a violation of ROP No. MI-ROP-N7221-2015a, FGPROD®RIND, SC VI.13.

The maximum exhaust dimension for the stack that replaced SVEXTR1 is 42 inches in diameter which is larger than the permitted maximum diameter of 24 inches. This is a violation of ROP No. MI-ROP-N7221-2015a, FGPROD®RIND, SC VIII.1.

R.L. Adams Plastics, Inc.'s 2018 ROP Semi-Annual Certifications and Annual Certification from January 1, 2018 through December 31, 2018 did not include these deviations.

Mr. Karl Adams
R.L. Adams Plastics, Inc.
Page 2
April 19, 2019

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 10, 2019 (which coincides with 21 calendar days from the date of this letter). 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.

Please submit the written response to the DEQ, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

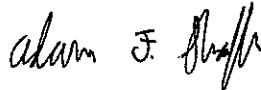
Please include in the response the following:

- Measurements (maximum exhaust dimensions (inches) and minimum height above ground (feet)) for the remaining nine stacks not requested during the site inspection that are listed in ROP No. MI-ROP-N7221-2015a.

If R.L. Adams Plastics, 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 violations cited above and for the cooperation that was extended to me during my inspection of R.L. Adams Plastics, Inc. 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,



Adam Shaffer
Environmental Quality Analyst
Air Quality Division
616-356-0767

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ