



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 17, 2021

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

SRN: N7221, Kent County

Dear Mr. Adams:

VIOLATION NOTICE

On June 8, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a review of isopentane laboratory results provided by R. L. Adams Plastics, Inc. located at 5955 Crossroads Commerce, Wyoming, Michigan. The purpose of this review 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-N7221-2019a.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGPROD®RIND	MI-ROP-N7221-2019a, Special Condition I.1	Exceeded 170 tons per year Volatile Organic Compound (VOC) limit.
FGPROD®RIND	MI-ROP-N7221-2019a, Special Condition II.1	Exceeded 340,000 pounds of isopentane material limit.
FGPROD®RIND	MI-ROP-N7221-2019a, Special Condition VI.7.f & h	Failure to properly identify the average isopentane content of the plate stock and laminate stock finished goods.
FGPROD®RIND	MI-ROP-N7221-2019a, Special Condition VI.9	Failure to properly calculate the VOC emission rate.

On June 1, 2021, R. L. Adams Plastics, Inc. provided a laboratory report of the isopentane content for plate stock and laminate stock finished goods. This data indicates that the VOC (isopentane) retention in the final product is significantly lower than what the company has historically assumed. The records provided demonstrate that actual emissions of VOC (isopentane) from the FGPROD®RIND process equipment are at least 208.0 tons per 12-month rolling time period. This value exceeds the 170 ton per 12-month rolling VOC limit established in MI-ROP-N7221-2019a.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 8, 2021 (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 recurrence.

Please also include 12-month rolling time period VOC emissions records for the past five (5) years using the updated isopentane contents.

Please submit the written response to EGLE, AOD, 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 EGLE, AOD, P. O. Box 30260, Lansing, Michigan 48909-7760.

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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Ms. Anette Arrieta, R. L. Adams Plastics, Inc.
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE
Mr. Michael Cox, EGLE