



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 21, 2019

Mr. Mark Griswold, General Manager
Ventra Fowlerville, LLC
8887 West Grand River
Fowlerville, Michigan 48836-9208

SRN: N7413, Livingston County

Dear Mr. Griswold:

VIOLATION NOTICE

On January 9, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Ventra Fowlerville, LLC located at 8887 W. Grand River, Fowlerville, Michigan. The purpose of this inspection was to determine 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-N7414-2014a; During the inspection and after review of the Hazardous Air Pollutant emission records, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-MACTSUBJECT which included EUAPPROCESS and EUCOATINGLINE	40 CFR 63.4490(a)(1) Special Condition I.1 0.16 lb Organic HAP per lb of coating solids. 40 CFR 63.4490(a)(1)	Calculations originally used control credit to comply. Revised emission calculations had errors. During a meeting on March 4, 2019, the AQD requested more information which was provided on March 8, 2019. Review of this information again showed errors and did not provide emission rate summary data. Based upon the information provided the facility exceeded the emission limit during 2018.
FG-MACTSUBJECT which included EUAPPROCESS and EUCOATINGLINE	40 CFR 63.4492(b) and Table 1. Special Condition III.1 No monitoring data or operating limits established for either a PTI or Non-PTE capture system.	The facility was applying control credit but did not have adequate monitoring to verify operating limits or recordkeeping for monitoring operating parameters to use this compliance option.

FG-MACTSUBJECT which included EUAPPROCESS and EUCOATINGLINE	40 CFR 63.4493(b)(1) through (c). Special Condition III.2. No Work Practice Plan	The facility was applying control credit but did not have a Work Practice Plan established.
FG-MACTSUBJECT which included EUAPPROCESS and EUCOATINGLINE	40 CFR 63.4500(c) Special Condition III.3 No Start up, Shut Down and Malfunction Plan (SSMP)	The facility was applying control credit but did not have a SSMP established.
FG-MACTSUBJECT which included EUAPPROCESS and EUCOATINGLINE	40 CFR 63.4560 (a)(1) 40 CFR 63.4564(a) Special Condition V.2 No capture test performed which established Capture system Operating Parameters.	The facility was applying control credit but did not conduct a proper capture test to establish Operating Parameters.
FG-MACTSUBJECT which included EUAPPROCESS and EUCOATINGLINE	40 CFR 63.7(b) 40 CFR 63.8(f)(4) 63.9(b) through (h) 40 CFR 63.4510 Special Condition VII.7 and VII.8	The facility did not provide the proper compliance option for compliance reports, the facility did not properly report deviations from the standard or the facility did not provide a notification of change for changing the compliance option.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 11, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates each of the violations occurred; an explanation of the causes and duration for each of the violations; whether each of the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct each of the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. In Addition, the facility needs to update and provide the following with the response:

- How long the facility has been applying control credit for HAP?
- Corrected and accurate emission records for HAP emissions.
- Revised/Corrected deviation reports as required under Rules 336.1213(3)(c)(ii) and 336.1213(4)(c). Note: this maybe an additional violation if past records were not accurate.

Mr. Mark Griswold
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Please submit the written response to the DEQ, AQD, Lansing District, at 525 W. Allegan, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Ventra Fowlerville, LLC 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 on January 9, 2019. If you have any questions regarding this Violation Notice or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Robert Byrnes
Senior Environmental Engineer
Air Quality Division
517-275-0439

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