



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 4, 2015

Ms. Brenda Wisniewski
Plasan Carbon Composites
3195 Wilson Drive
Walker, Michigan 49534

SRN: P0374, Kent County

Dear Ms. Wisniewski:

VIOLATION NOTICE

On July 30, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Plasan Carbon Composites located at 3195 Wilson Drive, Walker, Michigan. The purpose of this inspection was to determine Plasan Carbon Composites' 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; the conditions of Permit to Install (PTI) numbers 130-12 and 130-12A; and the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products found in 40 CFR Part 63, Subpart PPPP.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	PTI No. 130-12, FGFACILITY, Special Condition (SC) I.1	Exceedance of individual HAP emission limit (9.0 tpy)
FGFACILITY	PTI No. 130-12A, FGFACILITY, SC I.1	Exceedance of individual HAP emission limit (9.9 tpy)
FGPAINT	PTI No. 130-12A, FGPAINT, SC III.4	Failure to maintain average cure oven temperature below 194°F maximum limit
FGPAINT	PTI No. 130-12A, FGPAINT, SC IV.3	Failure to maintain a device to monitor the cure oven temperature on a continuous basis
Surface Coating of Plastic Parts and Products	40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products	Failure to submit a timely initial notification for an affected source

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Facility records show that individual HAP emissions exceeded the major source threshold of 10 tons per year on March 18, 2015. Under Rule 210(6), an administratively complete Renewable Operating Permit application shall be submitted not more than 12 months after the stationary source becomes a major source. Therefore, an administratively complete Renewable Operating Permit application is due March 18, 2016.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 25, 2015 (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.

If Plasan Carbon Composites 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 Plasan Carbon Composites. 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,



Kaitlyn DeVries
Environmental Quality Analyst
Air Quality Division
616-356-0003

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