



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

February 24, 2014

Mr. Nathan Dubuc
Vice President - Operations
Champion Gasket and Rubber, Inc.
3225 Haggerty Road
Walled Lake, Michigan 48390-1725

SRN: P0501, Oakland (63) County

Dear Mr. Nathan Dubuc:

VIOLATION NOTICE

On February 19, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Champion Gasket and Rubber, Inc. ("Champion") located at 3225 Haggerty Road, Walled Lake, Michigan. The purpose of this inspection was to determine Champion'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); and the administrative rules.

During the February 19, 2014 inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Universal laser cutting machine	Rule 336.1201 (Permit-to-Install)	Champion Gasket and Rubber, Inc. ("Champion") installed the laser cutting machine without obtaining a Permit-to-Install. ⁶
⁶ In lieu of obtaining Permit-to-Install according to Rule 336.1201 (Rule 201), Champion may install and operate properly appropriately designed and operated fabric filter or cartridge filter with pre-cleaning cyclone to protect filters from relatively large particles; large particles may cause wear and tear damage to the filter media upon impact due to their higher momentum. The filtered (and cleaned of particles) exhaust gases may be discharged in-plant environment or to outside ambient air like the existing set-up. These conditions are based upon Rule 336.1285(l)(vi).		

During this inspection, it was noted that Champion had installed and commenced operation of an unpermitted process equipment, known as Universal laser cutting machine, at this facility. The AQD staff advised Champion on February 19, 2014 that this is a violation of Act 451, Rule 201.

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.

A permit application is not necessary if the conditions of Rule 336.1285(I)(vi) are satisfied as stated above.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 17, 2014 (which coincides with 21 calendar days from the date of this letter). 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 Champion 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 violation cited above and for the cooperation that was extended to me during my inspection of Champion. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-753-3741 or konanahalli@michigan.gov

ISK /DAC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ
Ms. Jenine Camilleri, DEQ