



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

July 9, 2024

Fernando Fernandez
Lakeland Monroe Group - Plant 2
5400 36th Street SE
Grand Rapids, Michigan 49512

SRN: N7645, Kent County

Dear Fernando Fernandez:

VIOLATION NOTICE

On June 25, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Lakeland Monroe Group - Plant 2 located at 5400 36th Street, Grand Rapids, Michigan. The purpose of this inspection was to determine Lakeland Monroe Group- Plant 2'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 Permit to Install (PTI) number 224-06A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Line 5	PTI No. 224-06A, EU-CoatLine-05, Special Condition VI.5	Failure to calculate emissions of isopropyl alcohol use.
Coating Line 4	PTI No. 224-06A, FG-CoatLines, Special Condition IV.3	Cure oven temperature above 194°F.
Coating Line 1 and 4	PTI No. 224-06A, FG-CoatLines, Special Condition VI.3	Failure to calculate emissions of isopropyl alcohol use.
All coating lines combined	PTI No. 224-06A, FG-CoatLines, Special Condition I.7	Exceeded daily xylene emission limit on 1 day.
All coating lines combined	PTI No. 224-06A, FG-CoatLines, Special Condition I.8	Exceeded daily hexamethylene diisocyanate limit on 66 days.
Coating Line 4	PTI No. 224-06A, FG-CoatLines, Special Condition I.10	Exceeded Part 6 Volatile Organic Compound coating content limit on 28 days.

A recordkeeping review identified that Lakeland Monroe Group - Plant 2 had violated multiple limits contained in the permit as identified above. Additionally, the facility is using isopropyl alcohol to wipe down parts prior to being coated and that use is not being included in the recordkeeping for total volatile organic compound (VOC) emissions. A review of temperature records for the Line 4 cure oven found that the limit of 194°F had also been exceeded.

During the inspection, it was noted that Lakeland Monroe Group - Plant 2 had begun construction of an externally vented wash line which would be considered part of the Coating Line 5 emission unit. Certain processes and process equipment may be exempt from obtaining a PTI. Rule 278 establishes requirements of eligibility for exemptions listed in Rules 280 through 291. To be eligible for a listed exemption, the owner or operator of an exempt process or exempt process equipment must be able to provide information demonstrating the applicability of the exemption. Pursuant to Rule 278(a), this demonstration should be provided within 30 days of a written request by the AQD and should include the following information:

- The specific exemption being used by the process or process equipment.
- An analysis demonstrating that Rule 278 does not apply to the process or process equipment.

Please submit a Rule 278 demonstration for the wash portion of Coating Line 5, or identify the need for a permit modification within 30 days of the date of this letter.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 30, 2024 (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 April Lazzaro at EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Raids, Michigan 49503 or LazzaroA1@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lakeland Monroe Group - Plant 2 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.

Fernando Fernandez
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Lakeland Monroe Group - Plant 2. 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,

A handwritten signature in cursive script that reads "April Lazzaro".

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

cc: Andy Boddy, Advanced Environmental Services
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE