



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

June 29, 2018

Mr. Jeffery Schwartz
Rollie Williams Paint Spot
1179 Kent Street
Elkhart, Indiana 46514

SRN: A0703, Cass County

Dear Mr. Schwartz:

SECOND VIOLATION NOTICE

On March 28, 2018, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), conducted an inspection of Axium Group, LLC (Facility), located at 708 Sherman Lane, Cassopolis, Michigan. The purpose of the inspection was to determine the Facility's compliance with the requirements of the federal Clean Air Act; and 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) No. MI-ROP-A0703-2017.

On April 9, 2018, the AQD sent the Facility a Violation Notice (VN) citing violations discovered as a result of the inspection and requested your written response by April 30, 2018. Below is an updated table of cited violations taking into account information and records obtained during telephone conversations, emails, and meetings between the MDEQ and the Facility.

Process Description	Rule/Permit Condition Violated	Comments
EUSANDER	ROP No. MI-ROP-A0703-2017, EUSANDER, Special Condition (SC) VI.1	The permittee should be recording weekly pressure drop readings on EUSANDER during peak operating conditions. The permittee responded that they would apply for a modification of their Permit to Install (PTI) to remove EUSANDER from the permit. As of this VN, no PTI application has been received.

EUFLATLINE1	ROP No. MI-ROP-A0703-2017, EUFLATLINE1, SC II.1	Material limit of the volatile organic compounds (VOC) content of stains is 2.0 lb/gal (minus water) as applied. The Facility has five coatings that exceeded this limit per the manufacturer's data sheet. Three of those coatings exceeded the limit based on Method 24 testing. The permittee responded that they would apply for a modification to the PTI to increase material limits. As of this VN, no PTI application has been received and the stains have not been reformulated.
EUFLATLINE1	ROP No. MI-ROP-A0703-2017, EUFLATLINE1, SC II.3	Material limit of the VOC content of UV stains, sealers, and topcoats is 4.7 lb/gal (minus water) as applied. According to Method 24 testing, the UV topcoat has a VOC content of 5.0 lb/gal (minus water). The permittee responded that they would apply for a modification to the PTI to increase material limits. As of this VN, no PTI application has been received and the stains have not been reformulated.
EUFLATLINE1	ROP No. MI-ROP-A0703-2017, EUFLATLINE1, SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar

		<p>month. To date, no calculations have been provided. The printouts provided to the Facility by the supplier do not provide the calculations used to generate the calculated emissions. The Excel sheets submitted to the MDEQ containing emissions data do not contain calculations verifying the emissions reported by the supplier nor the calculations used to sum the manufacturer reported emissions.</p>
EUFLATLINE1	ROP No. MI-ROP-A0703-2017, EUFLATLINE1, SC VII.1	<p>Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. Noncompliant stains and UV topcoats used on FLATLINE1 should be reported to the MDEQ as deviations from the permit pursuant to General Conditions 21 and 22.</p>
FGFACILITY	ROP No. MI-ROP-A0703-2017, FGFACILITY, SC VI.1	<p>The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month. To date, no calculations have been provided. The printouts provided to the Facility by the supplier do not provide the calculations used to generate the calculated emissions. The Excel sheets submitted to the MDEQ</p>

		containing emissions data do not contain calculations verifying the emissions calculated by the supplier nor the calculations used to sum the manufacturer reported emissions.
FGFACILITY	ROP No. MI-ROP-A0703-2017, FGFACILITY. SC VI.2.d	Individual and aggregate hazardous air pollutant (HAP) emission calculations determining the monthly emission rate of each in tons per calendar month is required. Currently, a number is provided for the individual HAP emission calculations. However, no details or calculations are provided to indicate which HAP is being reported as the highest individual HAP.
FGWOODCOATING	ROP No. MI-ROP-A0703-2017, FGWOODCOATING, SC II.1	Material limit of the VOC content of stains is 3.4 lb/gal (minus water) as applied. Method 24 testing shows that three stains are above this material limit. The permittee responded that they would apply for a modification of the PTI to increase these limits. As of this VN, no PTI application has been received and the stains have not been reformulated.
FGWOODCOATING	ROP No. MI-ROP-A0703-2017, FGWOODCOATING, SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar

		<p>month. To date, no calculations have been provided. The printouts provided to the Facility by the supplier do not provide the calculations used to generate the calculated emissions. The Excel sheets submitted to the MDEQ containing emissions data do not contain calculations verifying the emissions calculated by the supplier nor the calculations used to sum the manufacturer reported emissions.</p>
FGWOODCOATING	ROP No. MI-ROP-A0703-2017, FGWOODCOATING, SC VII.1	<p>Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. Noncompliant stains used on FGWOODCOATING should be reported to the MDEQ as deviations from the permit pursuant to General Conditions 21 and 22.</p>
FGDIPTANKS	ROP No. MI-ROP-A0703-2017, FGDIP TANKS, SC V.1	<p>The VOC content of coatings, as applied (minus water), shall be tested using Method 24 as follows: On an annual basis, the permittee shall test the most frequently used stain. As of this VN, no Method 24 testing has been performed on the stain used in the dip tanks.</p>
FGDIPTANKS	ROP No. MI-ROP-A0703-2017, FGDIP TANKS, SC VI.1	<p>The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the</p>

		last day of the calendar month. To date, no calculations have been provided. The printouts provided to the Facility by the supplier do not provide the calculations used to generate the calculated emissions. The Excel sheets submitted to the MDEQ containing emissions data do not contain calculations verifying the emissions calculated by the supplier.
FGDIPTANKS	ROP No. MI-ROP-A0703-2017, FGDIPTANKS, SC VI.3.b	The Facility is required to keep the VOC content (minus water and with water) of each stain and clean-up solvent as applied. Water is used to adjust the viscosity of the dip tank stain. Therefore, the Facility is not providing the above information as applied.

Please be advised that failure to respond in writing and identifying actions the Facility will take or has taken to resolve the cited violations may result in escalated enforcement action by the AQD. Please provide the information requested in our April 9, 2018, letter by July 19, 2018, which corresponds to 21 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 the: MDEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009-5025. Also, please submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, MDEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this VN does not preclude or limit the MDEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

Mr. Jeffery Schwartz
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If you have any questions regarding the violations or the actions necessary to bring the Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
269-910-2109

AC:CF

cc: Ms. Mary Ann Dolehanty, MDEQ
Mr. Craig Fitzner, MDEQ
Mr. Christopher Ethridge, MDEQ
Ms. Jenine Camilleri, MDEQ
Ms. Mary Douglas, MDEQ