



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

August 14, 2014

Mr. Erik Klimek, President
Expert Coating Company
2855 Marlin Court
Grand Rapids, Michigan 49504

SRN: A2722, Kent County

Dear Mr. Klimek:

VIOLATION NOTICE

On May 29, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Expert Coating Company located at 2855 Marlin Court, Grand Rapids, Michigan. The purpose of this inspection was to determine Expert Coating Company'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 administrative rules; and the conditions of Permit to Install (PTI) number 317-74.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
BURN-OFF OVEN	Rule 210	Expert Coating Company has the potential to emit an individual HAP at greater than the major source threshold of 10 tons per year.

After the inspection, AQD staff requested that a potential to emit demonstration be completed and submitted to the AQD in order to determine Expert Coating Company's compliance with Rule 210. The potential emissions of HCl for the rack burn-off process are approximately 15 tons per year, which exceeds the major source threshold for an individual hazardous air pollutant of 10 tons per year.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 2, 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

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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 Expert Coating Company 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 Expert Coating Company. If you have any questions regarding the violation 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 "Prudy Blue" followed by a small "for" written below the end of the signature.

Jenifer M. Dixon
Senior Environmental Quality Analyst
Air Quality Division
616-356-0003

cc: Ms. Heidi Hollenbach DEQ
cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ