



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

April 21, 2014

Mr. Dennis Hillman  
Global Enterprises  
50450 E. Russell Schmidt Boulevard  
Chesterfield, MI 48051

SRN: A3037, Macomb County

Dear Mr. Hillman:

**SECOND VIOLATION NOTICE**

On February 25, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Global Enterprises located at 50450 E. Russell Schmidt Boulevard in Chesterfield, Michigan. The purpose of this inspection was to determine Global Enterprises' 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.

The AQD issued a Violation Notice (VN) to Global Enterprises on March 10, 2014, for installing and operating six adhesive spray booths without obtaining a Permit-To-Install. Potential-to-Emit (PTE) calculations submitted by your company to the AQD in response to this VN indicate that potential emissions of toluene, hexane, and aggregate Hazardous Air Pollutants (HAPs) from the adhesive spray booths exceed major source threshold levels (10 tons per year for an individual HAP and 25 tons per year for aggregate HAPs). The PTE from the adhesive spray booths make Global Enterprises a major source with respect to potential emissions of HAPs. Therefore, Global Enterprises is being issued this VN for violating State of Michigan Rule 336.210. In addition, since potential emissions of HAPs exceed major source thresholds, Global Enterprise is also in violation of Maximum Achievable Control Technology (MACT) Subpart PPPP, the National Emission Standard for HAPs for the Surface Coating of Plastic Parts and Products. MACT Subpart PPPP can be referenced at 40 CFR Part 63 which lists National Emissions Standards of HAPs for specific source categories. The specifics of the violations are listed below.

Process Description	Rule/Permit Condition Violated	Comments
Six adhesive spray booths	Rules 336.1210	Global Enterprises failed to obtain an ROP and to submit an administratively complete application in a timely manner according to the schedule stated in Rules 336.1210 (4 and 5).
Six adhesive spray booths	40 CFR Part 63 Subpart PPPP	Global Enterprises is in violation of MACT Subpart PPPP for the surface coating of plastic parts and products.

Under the State of Michigan's Air Pollution Control law and the federal Clean Air Act, a Renewable Operating Permit (ROP) program has been developed and implemented in

Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(5) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires major sources to submit an application to the Department of Environmental Quality (DEQ), Air Quality Division (AQD) not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

Based on the commencement of operation of Global Enterprises, located at 50450 E. Russell Schmidt Boulevard, Chesterfield, Michigan 48051, an application for a ROP should have been submitted according to the schedule stated above. To date, the AQD has not received this application. This constitutes a violation of Rule 210(1) of Act 451 which requires that a source not operate any emission units at a source required to obtain a ROP unless a timely and administratively complete application has been received by the DEQ. As a result of the failure to submit a timely and administratively complete application in accordance with the requirements of Rule 210(5) of Act 451, this facility has failed to obtain an "application shield".

Please initiate actions necessary to correct the cited violations and **submit a written response to this Violation Notice by May 12, 2014** (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 Global Enterprises 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 Global Enterprises. 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,



Erik Gurshaw  
Environmental Quality Analyst  
Air Quality Division  
586-753-3743

EG/DC

Enclosures: Rules 210 and Potential-To-Emit Calculations  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ