



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 19, 2021

VIA E-MAIL

Mr. Joseph Marecic
Environmental Health, Safety & Security Manager
Axalta Coating Systems, LLC
400 North Groesbeck Highway
Mount Clemens, MI 48043

SRN: A3569, Macomb County

Dear Mr. Marecic:

VIOLATION NOTICE

On February 9, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Axalta Coating Systems, LLC located at 400 North Groesbeck Highway, Mount Clemens, Michigan. The purpose of this inspection was to determine Axalta Coating Systems' 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; 40 CFR Part 63, Subpart CCCCCC – National Emission Standards for Area Sources: Paints and Allied Products Manufacturing; 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Stationary Reciprocating Internal Combustion Engines; 40 CFR Part 60, Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A3569-2017A.

Process Description	Rule/Permit Condition Violated	Comments
EU-DISP-TANKS: 11 Dispersion Tanks used to disperse particles for solvent borne paint manufacturing.	MI-ROP-A3569-2017a FG-DISP-TANKS Special Condition VI.5.	Axalta "double counted" throughput and submitted inaccurate throughputs in EU-DISP-TANKS.
EU-DISP-TANKS: 11 Dispersion Tanks used to disperse particles for solvent borne paint manufacturing.	MI-ROP-A3569-2017a FG-DISP-TANKS Special Conditions VI.4 & VI.5.	Axalta misused EPA EIIP Volume 2, Chapter 8 Equation 8.4-1 when calculating VOC emissions from EU-DISP-TANKS.
EU-WBI: Waterborne Intermediate Paint Manufacturing consisting of dispersions and	MI-ROP-A3569-2017a EU-WBI Special Conditions VI.1 & VI.3.	Axalta did not provide acceptable VOC emission records to AQD in a timely manner.

intermediates making process.		
EU-S-MEDIA-MILLS(1-4): Four “small media mills”	MI-ROP-A3569-2017a EU-S-MEDIA-MILLS(1-4) Special Conditions VI.2 & VI.5.	Axalta did not provide acceptable VOC emission records to AQD.
EU-WBSB: Waterborne paint small batch manufacturing.	MI-ROP-A3569-2017a EU-WBSB Special Conditions VI.1, & VI.2.	Axalta did not provide acceptable VOC emission records to AQD.
FG-RULE 290: Any emission unit that emits air contaminants and is exempt from the requirements of Rule 201; pursuant to Rules 278, 278a, and 290.	MI-ROP-A3569-2017a FG-RULE 290 Special Conditions VI.1e, & VI.1f.	Axalta did not provide acceptable VOC emission records to AQD.

Axalta submitted inaccurate throughputs for EU-DISP-TANK. Axalta stated that they originally submitted “double counted” emissions. Axalta stated that this is due to accidentally counting both materials received, and materials delivered as throughput. AQD has not received documentation to verify how throughputs at Axalta were double counted. In the response to the violation notice, please provide documentation that can show AQD how these throughputs were double counted.

Furthermore, throughputs in EU-DISP-TANK are inconsistent between the original 2020 emission factor calculation (7,331 tons), the updated emission factor calculation to account for double counting (3,237 tons), and the 2020 calendar year 12-month rolling records (4,760 tons). Please provide an explanation for these inconsistencies in the response to this violation notice.

Axalta misused EPA Vol 2 Chapter 8 Equation 8.4-1 when calculating VOC emissions from EU-DISP-TANK. This resulted in inaccurate monthly and 12-month rolling VOC emission totals. AQD has not received accurate VOC emission calculations for EU-DISP-TANK at this time.

The inaccuracies in the FG-DISP-TANKS calculation bring to question the legitimacy of other emission unit calculations which utilize the same calculation methodology. For this reason, AQD requested that Axalta provide excel documents detailing emission factor calculations for all emission units which utilize this calculation methodology by August 13, 2021, otherwise a violation notice will be issued for failing to provide acceptable records. These additional emission units include (but may not be limited to) EU-FSO, EU-BT, RG-CGM-PAINT, EU-FUGITIVES, EU-LMZ, EU-TSM, EU-SBI, EU-WBI, EU-S-MEDIA-MILLS(1-4), EU-ECOATSUP, EU-MBFPT, EU-QA-ECOAT, EU-WBSB, and EU-LMZ5. Axalta did not provide updated emission factor calculations for these emission units by August 13, 2021.

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Please initiate actions necessary to correct the cited Violations and submit a written response to this Violation Notice by November 9, 2021 (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 EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Axalta Coating Systems, LLC 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 Axalta. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Adam Bogner
Environmental Engineer
Air Quality Division
586-854-1517; bognara1@michigan.gov

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE