



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
UPPER PENINSULA DISTRICT OFFICE



C. HEIDI GRETHOR
DIRECTOR

August 8, 2017

Mr. Mark Erickson
Lloyd Flanders
3010 10th Street
Menominee, Michigan 49858

SRN: A3988, Menominee County

Dear Mr. Erickson:

VIOLATION NOTICE

On July 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Lloyd Flanders located at 3010 10th Street, Menominee, Michigan. The purpose of this inspection was to determine Lloyd Flanders' 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 128-82C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Pre Paint/Topcoat operations use coatings containing various amounts of Volatile Organic Compounds (VOC)	SC 13. VOC content of the coatings used in the prepaint/topcoat operation (including 4 electrostatic spray booths) shall not exceed 3.0 lbs/gal.	A list of coatings used at the facility was submitted to AQD on August 7, 2017. VOC contents of several coatings exceeded 3 lbs/gal.
Topcoat operation, Touch-up operation, Miscellaneous VOC usage	SC 22. The permittee shall keep a separate record for each calendar month of the following for the Topcoat operation, Touchup operation, and Misc. VOC usage: A 2. The amount in gallons of each coating and miscellaneous volatile organic compound used.	Monthly usage records were unavailable when requested for all coatings and miscellaneous VOCs

Topcoat operation, Touch-up operation, Miscellaneous VOC usage	SC 22. The permittee shall keep a separate record for each calendar month of the following for the Topcoat operation, Touchup operation, and Misc. VOC usage: B. Calculation for the following: 12 month rolling average VOC emission rate in tpy for each process.	Monthly and 12 month rolling time period VOC emission rates were not available upon request.
Topcoat operation, Touch-up operation, Miscellaneous VOC usage	SC 22. The permittee shall keep a separate record for each calendar month of the following for the Topcoat operation, Touchup operation, and Misc. VOC usage: C. Calculation of the following: 12 month rolling average HAP emission rates in tpy for each individual HAP and for all HAPs combined.	Monthly and 12 month rolling time period HAP emission rates were not available upon request.

During this inspection, Lloyd Flanders was unable to produce emission records.

This is a violation of (the recordkeeping and emission limitations) specified in Special Condition numbers 14, 15, 16, and 22 of PTI number 128-82C.

The conditions of PTI number 128-82C require maintenance of VOC and HAP emission rates on a monthly and 12 month rolling time period basis, which shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 30, 2017 (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 Lloyd Flanders 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 Lloyd Flanders. 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,



Sydney Bruestle
Environmental Quality Analyst
Air Quality Division
906-236-3995

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Ed Lancaster, DEQ