

GRETCHEN WHITMER

GOVERNOR

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

GRAND RAPIDS DISTRICT OFFICE

STATE OF MICHIGAN



July 12, 2021

Mr. Paul MacVane Centennial Coatings LLC 371 North Centennial Avenue Zeeland, Michigan 49464

SRN: A5814, Ottawa County

Dear Mr. MacVane:

VIOLATION NOTICE

On June 30, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Centennial Coatings LLC located at 371 North Centennial Avenue, Zeeland, Michigan. The purpose of this inspection was to determine Centennial Coatings LLC'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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 219-15.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------------|--|--|
| Burn-off Oven (EUBURNOFF) | PTI No. 219-15, EUBURNOFF, Special Condition (SC) III.3 | Failure to calibrate the thermocouples associated with the primary and secondary chambers annually. |
| | PTI No. 219-15, EUBURNOFF, SC VI.2 | Failure to install a device to monitor the afterburner temperature continuously (at least once every 15 min). |
| | PTI No. 219-15, EUBURNOFF, SC VI.1 & VI.2 | Failure to maintain afterburner temperature records. |

AQD staff was informed that the thermocouples for EUBURNOFF's primary and secondary chambers had not been calibrated since installed in 2015. The PTI requires calibrations to be performed at least annually. In addition, a device to continuously record the afterburner's temperature has not been installed. These are violations of PTI No. 219-15, EUBURNOFF, SC III.3 and VI.2, respectively.

Centennial Coatings LLC was unable to produce temperature records which is a violation of the recordkeeping requirements specified in PTI No. 219-15, EUBURNOFF, SC VI.1 and VI.2. Special Condition VI.1 requires all records to be completed by the 15th day of the calendar month for the previous month and SC VI.2 requires afterburner temperature records to be maintained and made available for review upon request by AQD staff.

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In order to show compliance with the batch limit specified in PTI No. 219-15, EUBURNOFF, SC II.2, the facility is required to maintain a record of the number of batches conducted on a monthly and rolling 12-month time period. These records are not being maintained and should be going forward.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 2, 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, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Centennial Coatings 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 Centennial Coatings LLC. 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

Chris Robinson Environmental Quality Analyst Air Quality Division 616-286-0083

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