



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

March 21, 2016

Mr. Jay Burkard, President
Burkard Industries, Inc.
35300 Kelly Road
Clinton Township, Michigan 48035

SRN: B6067, Macomb County

Dear Mr. Burkard:

VIOLATION NOTICE

On March 4, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Burkard Industries, Inc. located at 35300 Kelly Road, Clinton Township, Michigan. The purpose of this inspection was to determine Burkard Industries' 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 252-02 and 54-08.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-ECOAT	PTI No. 252-02, SC 1.6	Permit is not keeping adequate records of the coating usage, solvent usage, etc. The submitted records do not show units of measurement, VOC content of the coatings and solvents, Monthly and 12-month rolling VOC mass emission calculations, etc. to show compliance with the VOC emission limit.
FG-MetalParts	PTI No. 54-08, SC 1.2	The 2015 records show that the facility used coatings with VOC content greater than 3.5 lb/gal-water.
FG-MetalParts	PTI No. 54-08, SC 1.10	Facility did not perform emission calculations as required.
FG-MetalParts	PTI No. 54-08, SC 1.12	Facility did not keep monthly records of the coating usage, VOC content, monthly & 12-month rolling VOC emission calculations and hours of operations
FG-MetalParts	PTI No. 54-08, SC 1.13	Facility did not keep adequate monthly records of the solvent usage, VOC content, monthly & 12-month rolling VOC emission calculations.

FG-MetalParts	PTI No. 54-08, SC 1.14	Facility did not keep adequate records of the total amount of coating sprayed per calendar day and on a 12-month rolling basis.
FGFACILITY	PTI No. 54-08, SC 2.3	Facility did not calculate individual and aggregate HAP emissions to show compliance with the emission limits.
FGFACILITY	PTI No. 54-08, SC 2.4	Facility did not keep monthly records of the amount of HAP containing materials used, HAP content, and individual and aggregate HAP emission calculations on a monthly and 12-month basis.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **April 11, 2016** (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 Burkard Industries, Inc. 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 March 4, 2016. 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,



Sebastian Kallumkal
Senior Environmental Engineer
Air Quality Division
586 753 3738

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ