



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYHER
DIRECTOR

June 19, 2017

Mr. Rick Lucas, Manufacturing Manager
Roberts Sinto Corporation
150 Orchard Street, P.O. Box 39
Grand Ledge, Michigan 48837-0039

SRN: B7349, Eaton County

Dear Mr. Lucas:

VIOLATION NOTICE

On June 9, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of the Roberts Sinto Corporation located at 150 Orchard Street, Grand Ledge. The purpose of this inspection was to determine Roberts Sinto Corporation'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 to investigate a recent complaint we received on June 7, 2017, regarding paint and paint thinner-like odors attributed to Roberts Sinto Corporation's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Surface Coating Area	Rule 336.1201(1)	Surface coating line installed without a permit to install; Rule 287(2)(c) requirements were not met.
Surface Coating Area	Rule 336.1287(2)(c)	Records indicate the 200 gallon/month (minus water) coating usage limit was exceeded.
Surface Coating Area	Rule 336.1290(2)(a)(i)	Records indicate xylene usage exceeded 1000 lbs for January 2017.

During this inspection, it was noted that the Roberts Sinto Corporation had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised the Roberts Sinto Corporation on June 9, 2017, that this is a violation of Act 451, Rule 201, because they did not meet the exemption criteria specified in Rule 336.287(2)(c) and Rule 336.290(2)(a)(i).

Rule 336.1287(2)(c) states:

"The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

A surface coating line if all of the following conditions are met:

- (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
- (ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which

is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.

- (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request."

Specifically, based on the records Roberts Sinto Corporation provided during the inspection, the 200 gallons per month, minus water, was exceeded for the months of October 2016 (459 gallons), January 2017 (280 gallons), February 2017 (565 gallons), and March 2017 (556 gallons).

Rule 336.1290(2)(a)(i) states:

"The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the emission units listed in subdivision (a) of this subrule, if the conditions listed in subdivisions (b), (c), (d), and (e) of this subrule are met..."

- (a) An emission unit which meets any of the following criteria:

- (i) Any emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials that are listed in R 336.1122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively.

Xylene is used to cloth-clean parts prior to painting, to thin coatings, and to purge/clean paint lines. Upon reviewing xylene purchase records, and taking into consideration 12 gallons per month reclamation from purging the lines, it was determined that the Roberts Sinto Corporation exceeded the 1,000 lb./month limit in January 2017 at 1,101.6 lbs xylene emissions.

A program for compliance may include a completed PTI application for the surface coating line (paint area) process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

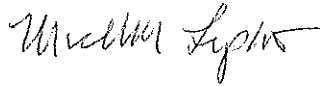
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 10, 2017. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; 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.

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 the Roberts Sinto Corporation 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 the Roberts Sinto Corporation. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-284-6636

ML:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ

