



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY

LANSING DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

April 9, 2020

Ms. Lisa Fisher, Materials Coordinator  
Allied Motion  
201 South Delaney Road  
Owosso, Michigan 48867

SRN: H2781, Shiawassee County

Dear Ms. Fisher:

**VIOLATION NOTICE**

On September 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Allied Motion, located at 201 S. Delaney Road, Owosso, Michigan. The purpose of this inspection was to determine Allied Motion'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, the conditions of Permit to Install (PTI) number 552-81C; and 40 CFR Part 63, Subpart T, National Emissions Standards for Halogenated Solvent Cleaning.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Detrex VS 2000 batch vapor degreaser using trichloroethylene (TCE)	40 CFR Part 63, Subpart T, Section 63.463(e)(iii)(A)	Working mode cover could not seal completely
Detrex VS 2000 batch vapor degreaser using TCE	40 CFR Part 63, Subpart T, Section 63.463( e)(iii)(B)	The inability of the working mode cover to seal properly, and crumbling of trim strips constitute defects.
Detrex VS 2000 batch vapor degreaser using TCE	40 CFR Part 63, Subpart T, Section 63.463(e)(2)(iv)(A)	Idling mode cover could not seal completely
Detrex VS 2000 batch vapor degreaser using TCE	40 CFR Part 63, Subpart T, Section 63.463(e)(2)(iv)(B):	The inability of the idling mode cover to seal properly, and crumbling of trim strips constitute defects
Detrex VS 2000 batch vapor degreaser using TCE	PTI No. 552-81C, Special Condition No. EU-DEGREASER 1.4	Failure to comply with all requirements of 40 CFR Part 63, Subpart T
Detrex VS 2000 batch vapor degreaser using TCE	Michigan Air Pollution Control Rule 910	Air pollution control device (the idling mode/working mode cover) was not maintained/operating properly.

The Detrex VS 2000 batch vapor degreaser is equipped with a two-part, rolling cover. This cover functions as the idling mode/downtime cover and the working mode cover, under 40 CFR Part 63, Subpart T. The cover is intended to function as one of the air pollution controls for the degreaser, but it could not close completely, as there was an opening or gap where the two door panels could not meet. In addition, there was crumbling of trim strips along the edges of the rolling door panels. These defects constitute violations of Section 63.463(e)(iii)(A) & (B), which requires the following:

(iii) If a working-mode cover is used to comply with these standards, the owner or operator shall comply with the requirements specified in paragraphs (e)(2)(iii)(A) and (e)(2)(iii)(B) of this section.

- (A) Ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed.
- (B) Ensure that the working-mode cover is maintained free of cracks, holes, and other defects.

The rolling cover to the degreaser may also be considered an idling mode or downtime cover, under 40 CFR Part 63, Subpart T. The inability of the idling mode cover to close completely and the crumbling of trim strips along the edges of the rolling door panels are considered defects by the AQD and are considered violations of 40 CFR Part 63, Subpart T, Section 63.463(e)(2)(iv)(A) & (B), which requires:

(iv) If an idling-mode cover is used to comply with these standards, the owner or operator shall comply with the requirements specified in paragraphs (e)(2)(iv)(A) and (e)(2)(iv)(B) of this section.

- (A) Ensure that the cover is in place whenever parts are not in the solvent cleaning machine and completely covers the cleaning machine openings when in place.
- (B) Ensure that the idling-mode cover is maintained free of cracks, holes, and other defects.

Furthermore, the inability of the working mode and idling mode cover to close completely constitutes a violation of Special Condition EU-DEGREASER No. 1.4 of PTI No. 552-81C, which requires:

The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63, Subparts A and T, as they apply to EU-DEGREASER.

Lastly, the inability of the working mode cover to close completely constitutes a violation of Michigan Air Pollution Control Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner, and in accordance with the administrative rules and existing law.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 30, 2020 (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, Lansing District, at Constitution Hall, 525 West Allegan, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Allied Motion 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 Allied Motion. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at my email address, [mcgeend@michigan.gov](mailto:mcgeend@michigan.gov), or at the number listed below.

Sincerely,



Daniel A. McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-284-6638

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