



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

November 8, 2023

VIA E-MAIL

Justin Bukovick, Manufacturing Engineer
Allied Motion Owosso
201 South Delaney Road
Owosso, MI 48867

SRN: H2781, Shiawassee County

Dear Justin Bukovick:

SECOND VIOLATION NOTICE

On August 23, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Allied Motion Owosso (Allied Motion), located at 201 South Delaney Road, Owosso, Michigan. The purpose of the inspection was to determine Allied Motion's compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 552-81C.

On October 11, 2023, the AQD sent Allied Motion a Violation Notice citing violations discovered as a result of the inspection and requested your written response by November 1, 2023. A copy of that letter is enclosed for your reference.

On October 31, 2023, the AQD received a response to the Violation Notice from Allied Motion. The response letter does not present an acceptable compliance plan for resolving all the cited violations. The reasons the response is not acceptable are detailed below.

The October 11, 2023, Violation Notice identified a violation of PTI 552-81C, Special Condition (SC) 1.4, for not meeting all provisions of 40 CFR Part 63, Subpart T, as required by the PTI. The October 31, 2023, response does not resolve all instances of noncompliance with Subpart T.

The October 11, 2023, Violation Notice also identified a violation of 40 CFR Part 63, Section 63.466(d), for wind speed not being measured and recorded in the room for the trichloroethylene batch vapor degreaser. The October 31, 2023, response proposes to take no action to correct this.

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Additionally, the October 11, 2023, Violation Notice identified a violation of 40 CFR Part 63, Section 63.463(e)(2)(ii)(A), for not ensuring that the flow of air across the top of the freeboard area, or within the degreaser was below the wind speed limit of Subpart T. The October 31, 2023, response proposes to take no action to correct this.

Last, the October 11, 2023, Violation Notice asked for confirmation of whether or not the batch vapor degreaser had a vapor level control switch, as required by Section 63.463(a)(5) of Subpart T. The October 31, 2023, response confirmed that there was not a vapor level control switch, although there were other safety features built into the degreaser. This does not comply with Subpart T.

Please be advised that failure to identify actions Allied Motion will take or has taken to resolve the above violations may result in escalated enforcement action by the AQD. Please provide the information requested in our October 11, 2023 letter by November 28, 2023, which corresponds to 21 days from the date of this letter.

Please submit the written response to Daniel McGeen at EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, First Floor South, Lansing, Michigan 48909 or McGeenD@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring Allied Motion into compliance, please contact me at the number listed below.

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE



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PHILLIP D. ROOS
DIRECTOR

October 11, 2023

Justin Bukovick, Manufacturing Engineer
Allied Motion Owosso
201 South Delaney Road
Owosso, Michigan 48867

SRN: H2781, Shiawassee County

Dear Justin Bukovick:

VIOLATION NOTICE

On August 23, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Allied Motion Owosso (Allied Motion) located at 201 South 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; and the conditions of Permit to Install (PTI) number 552-81C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Batch vapor degreaser using trichloroethylene (TCE)	PTI 552-81C, Special Condition (SC) 1.4	Not all provisions of 40 CFR Part 63, Subpart T were being met as required by the PTI.
Batch vapor degreaser using TCE	40 CFR Part 63, Section 63.466(d)	Wind speed was not being measured to determine and record reduced room draft for the degreaser.
Batch vapor degreaser using TCE	40 CFR Part 63, Section 63.463(e)(2)(ii)(A).	Not ensuring that the flow of air across the top of the freeboard area, or within the degreaser was below the wind speed limit of Subpart T.
Batch vapor degreaser using TCE	Section 63.466(a)(1).	The last date that the freeboard refrigeration device temperature was recorded was March 2, 2023.

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This process is also subject to the federal National Emission Standards for Halogenated Solvent Cleaning. These standards are found in 40 CFR Part 63, Subpart T. PTI 552-81C, EUDEGREASER, Special Condition 1.4 requires that 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 the degreaser. As identified during the inspection on August 23, 2023, not all provisions of Subpart T were met. Please see below for further details.

Indoor wind speed was not regularly measured by Allied Motion to determine and record reduced room draft for degreaser, in violation of Section 63.466(d) of Subpart T.

Because Allied Motion was not recording indoor wind speed measurements, they were not ensuring that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine, or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 feet per minute) at any time as measured using the procedures in Subpart T, Section 63.466(d), this violated Section 63.463(e)(2)(ii)(A).

From recordkeeping posted by the degreaser, the last date that the degreaser freeboard temperature was recorded appeared to be March 2, 2023, despite being operated as recently as July 2023, in violation of Section 63.466(a)(1) of Subpart T, which requires weekly recordkeeping.

Additionally, it was not confirmed, but it was believed that the degreaser does not have a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser. This is required by Section 63.463(a)(5) of Subpart T. Please verify if there is the required vapor level control device and include that and any corrective actions in your response to this letter.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 1, 2023, (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 Daniel McGeen at EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, First Floor South, Lansing, Michigan 48909 or mcgeend@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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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 the number listed below.

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE