



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 19, 2022

Joseph Lorentzen, Corporate Director Safety/QMS/EMS
Gallagher-Kaiser
13400 Mt Elliott St.
Detroit, MI 48212

SRN: M4573, Wayne County

Dear Joseph Lorentzen:

VIOLATION NOTICE

On August 8, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Gallagher-Kaiser Detroit located at 13400 Mt Elliott, Detroit, Michigan. The purpose of this inspection was to determine Gallagher-Kaiser’s compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); and the Michigan Air Pollution Control Rules. Subsequently, the AQD requested further information from Gallagher-Kaiser and the response was received on September 19, 2022.

Based on review of information received on September 19, 2022, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Paint booth	Rule 336.1201(1)	Paint booth does not meet the permit to install exemption in Rule 336.1287(2)(c) because coating usage exceeded 200 gallons, minus water, per month in February, March, April, May, and June 2021.

Records of coating usage minus water were received for the two-year period of August 2020 through August 2022. The coating usage rate exceeded the 200 gallons per month, minus water, limit in the R 336.1287(c) permit to install exemption during the following months: February, March, April, May, and June of 2021. As such, the paint booth is subject to R 336.1201(1) which requires a permit to install. AQD informed the facility of this finding via email on October 13, 2022.

Be advised that R 336.1201(1) 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.

Joseph Lorentzen
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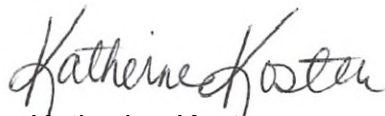
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 9, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. A program for compliance may include a completed permit to install (PTI) application for the paint booth. An application form is available by request, or at the following website: www.michigan.gov/air.

Please submit the written response to EGLE, AQD, Detroit District, at Cadillac Place, 3058 West Grand Boulevard, Suite 2-300, Detroit, Michigan 48202-6058 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Gallagher-Kaiser believes the above observations or statements are inaccurate or do not constitute violation of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during the inspection. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Katherine Koster
Environmental Engineer Specialist
Air Quality Division
313-418-0715

cc: Hosam Hassanien, City of Detroit BSEED
Crystal Rogers, City of Detroit BSEED
Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
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