



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

May 27, 2016

Mr. Justin McMillen
The Crown Group – Lynch Road
6334 Lynch Road
Detroit, Michigan 48234

SRN: M4623, Wayne County

Dear Mr. McMillen:

VIOLATION NOTICE

On March 29, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of The Crown Group – Lynch Road, located at 6334 Lynch Road, Detroit, Michigan. The purpose of this inspection was to determine The Crown Group – Lynch Road'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 administrative rules and General Permit to Install (PTI) number 46-04.

Following the inspection and review of required records, the AQD has identified the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Coating Line	General PTI No. 46-04, Special Condition II. 1	VOC emissions exceeded 2,000 pounds per month five times since September 2015.
	General PTI No. 46-04, Special Condition II. 1	VOC emissions exceeded 10 tons per 12-month rolling time period.
	General PTI No. 46-04, Special Condition III.A.1c, 1d, 1e, and 1h	Facility failed to maintain accurate records and calculate actual VOC emissions.

General PTI number 46-04, Special Condition II.1 limits the emissions of volatile organic compounds (VOCs) to 2,000 pounds per month and 10 tons per 12-month rolling time period for the coating line. Revised emission calculations submitted to AQD on May 13, 2016, indicate that the facility exceeded the VOC emission limit of 2,000 pounds per month limit during the following months: September 2015 (2,138 lbs.), October 2015 (2,188 lbs.), February 2016 (2,119 lbs.), March 2016 (2,197 lbs.), and April 2016 (2,122 lbs.). The facility exceeded the VOC emission limit of 10 ton per 12-month rolling time period for the 12-month time period ending in April 2016 (10.4 tons).

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The facility also failed to maintain accurate records of the VOC content of the coating used on the coating line as required per General PTI number 46-04, Special Condition III.A.1c and 1h, and failed to accurately calculate VOC emissions from the coating line, as required per General PTI number 46-04, Special Condition III.A.1d and 1e.

As a result, per Rule 621(10)(a), the coating line is no longer exempt from the remaining provisions of Rule 621 as described below:

If the actual rate of emissions from an exempted metallic surface coating line exceeds 2,000 pounds per month for a subsequent month or 10.0 tons per year for a subsequent year, then the provisions of this rule shall thereafter permanently apply to the metallic surface coating line.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 17, 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 The Crown Group – Lynch Road 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 Crown Group – Lynch Road. 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,



Jonathan Lamb
Senior Environmental Quality Analyst
Air Quality Division
313-456-4683

cc: Mr. Jason Nowak, The Crown Group
Ms. LaReina Wheeler, City of Detroit BSEED
Ms. Lynn Fiedler, DEQ
Ms. Heidi Hollenbach, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ