



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



DAN WYANT
DIRECTOR

July 15, 2015

Ms. Joy Garvey
Fastener Coatings, Inc.
1111 River Road
Three Rivers, Michigan 49093

SRN: N0760, St. Joseph County

Dear Ms. Garvey:

VIOLATION NOTICE

On July 2, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Fastener Coatings, Inc. (Facility), located at 1111 River Road, Three Rivers, Michigan. The purpose of this inspection was to determine the Facility'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 the conditions of Permit to Install (PTI) No. 171-03 and 216-00.

During the inspection, staff of the DEQ, AQD, observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Paint burn-off oven	Special Condition 1.4 of Permit No. 171-03.	Circular chart records indicate that temperature dropped below 1400 degrees on numerous occasions.
Paint burn-off oven	Special Condition 1.8a of Permit No. 171-03.	Weekly records of visible emission checks not kept.
Paint burn-off oven	Special Condition 1.7 of Permit No. 171-03.	Verification of oven temperature not performed every six months.
Coating booths	Special Condition 5 of Permit No. 216-00.	Visible emissions seen coming from booth stacks.
Recordkeeping	Special Condition 2 of Permit No. 216-00.	12-month rolling time period calculations for combined spray booths not found.
Recordkeeping	Special Condition 3 of Permit No. 216-00.	12-month rolling time period calculations for each spray booth not found.
Recordkeeping	Special Condition 4a and 4b of Permit No. 216-00.	Records for clean-up and purge solvents not found.
Recordkeeping	Special Condition 1.4d and 1.4e of Permit No. 171-03.	12-month rolling time period calculations for each individual hazardous air pollutant (HAP) and aggregate HAPs not found.

During the inspection, the Facility was unable to produce 12-month rolling time period emission records. This is a violation of the recordkeeping and emission limitations specified in Special Condition 2, 3, and 4d of PTI No. 216-00, and Special Condition 1.4d and 1.4e of PTI No. 171-03.

Individual records of cleanup and purge solvents used were not found. These records are required by Special Condition 4.b of PTI No. 216-00.

On July 2 and 9, 2015, staff of the AQD observed operation of the spray booths while visible emissions were observed coming out of the stacks. This constitutes a violation of Rule 910, of 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.

According to circular chart records for the burn-off oven, the temperature was below 1400 degrees during operation on the following days:

2011: February 2 to December 29
2012: Data not seen
2013: January 1, 2, 4, 8, 10, 14, 15, 19, 22, 28, 29, 30, 31
February 4, 5, 6, 8, 12, 13, 14, 18, 19, 20, 22, 25, 26, 28
March 4, 5, 6, 7, 8, 11, 12, 13, 14, 15, 20, 21, 25, 26, 28
April 1, 2, 3, 4, 8, 10, 11, 15, 17, 22, 25, 29, 30
May 1, 3, 6, 7, 8, 10, 14, 17, 20, 22, 24, 28, 29, 30
June 3, 5, 6, 7, 10, 11, 13
2014: January 2, 6, 15, 17, 20, 22, 24, 30
February 3, 4, 6, 7, 11, 13, 14, 18, 24, 26, 27
March 3, 5, 6, 11, 13, 14, 17, 19, 24, 26, 27, 28
April 3

This is in violation of Special Condition 1.4 of PTI No. 171-03. In addition, it did not appear that oven temperature checks were being performed every six months as required by Special Condition 1.7 of PTI No. 171-03. Also, records of weekly visible emission checks were not being kept as required by Special Condition 1.8a of PTI No. 171-03.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 5, 2015. 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 recurrence.

If the Facility 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.

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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 Facility. 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,



Dennis Dunlap
Environmental Quality Specialist
Air Quality Division
269-567-3553

DD:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ