



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 27, 2019

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

SRN: N0760, St. Joseph County

Dear Ms. Garvey:

VIOLATION NOTICE

On October 30, 2018, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Fastener Coatings, Inc. located at 1111 River Road, Three Rivers, Michigan. The purpose of this inspection was to determine Fastener Coatings, Inc'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 216-00.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Operations	Permit to Install No. 216-00, Special Condition 7. Volatile organic compounds (VOC) content of coatings need to be determined by Method 24.	The VOC content of Polane White and Polane Black was calculated to be higher than what is used in the recordkeeping sheets.

In a Violation Notice date November 14, 2018, it was noted that Special Condition 7 of PTI No. 216-00 requires that Method 24 be used to determine the VOC content of coatings unless prior approval is given by AQD to use formulation data. The notice went on to state that record of prior approval was not found, and that Method 24 testing of the three most used coatings to include Polane White, Polane Black, and Polane Mixed would be required.

In a follow up letter to the November 14, 2018 Violation Notice (dated December 17, 2018), EGLE requested coating samples be taken for three coatings. The last received response from Fastener Coatings, Inc. states, *"We believe the historic approach using formulation data provides a superior method for accounting for paint constituents on an as received and as mixed basis without spending hundreds of dollars per sample on the*

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Method 24 analysis". AQD district staff has deemed this response to be inadequate due to PTI No. 216-00 Special Condition 7, which requires Method 24 testing to be completed.

EGLE is requesting that coating samples be taken for the following three coatings (only three samples) to determine the VOC content by Federal Reference Test Method 24: One Polane White coating sample; One Polane Static Black; and one Polane Mixed sample. The samples should be taken as they would be applied with any reducer or thinner added, if applicable. If a catalyst or activator is used for the coating, it should not be added, but should be placed in a separate container for the laboratory.

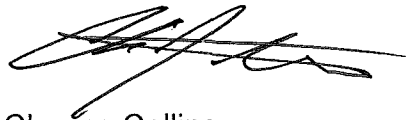
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 18, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes 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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Fastener Coatings, Inc. 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 violation cited above. 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,



Chance Collins
Environmental Quality Analyst
Air Quality Division
269-254-7119 / CollinsC21@Michigan.gov

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE