



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GRETHUR
DIRECTOR

December 12, 2018

Ms. Carrie Perry
Morgan Olson, LLC
1801 South Nottawa Street
Sturgis, Michigan 49091

SRN: N0879, St. Joseph County

Dear Ms. Perry:

VIOLATION NOTICE

On November 14, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Morgan Olson, LLC (Facility), located at 1861 Centreville Road and 1801 South Nottawa Street, Sturgis, 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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit MI-ROP-N0879-2017.

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

Process Description	Rule/Permit Condition Violated	Comments
FGCoating	MI-ROP-N0879-2017, Special Condition V.1. of FGCoating	Method 24 testing of coatings not done.
Spray gun cleaning stations (FGCold Cleaners)	MI-ROP-N0879-2017, Special Condition IV. 3. of FGCold Cleaners	It appears that three gun cleaning stations were vented to the outside.
EUMisc-VOC (FGRule290)	MI-ROP-N0879-2017, Special Condition I. 1. of FGRule290	Emission limit of 1,000 pound per month exceeded in October, November, and December of 2017; February, April, May, June, July, and August of 2018.
FGCoating	MI-ROP-N0879-2017, Special Condition II.1 of FGCoating	Material limit of 3.5 lb/gal (minus water and exempt solvents as applied) exceeded with UPS brown topcoat and

		Imron white topcoat (45N8998EX) according to the Safety Data Sheets.
Records of emission information	General Condition 17 of MI-ROP-N0879-2017	Some records were not readily available.

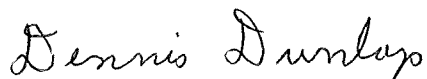
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 2, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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 the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009-5025; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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.

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 telephone number listed below.

Sincerely,



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

DD:CF

Enclosure

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Mary Douglas, DEQ
Mr. Rex Lane, DEQ