



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN

DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE

LIESL EICHLER CLARK
DIRECTOR



March 11, 2020

Mr. Marvin Hairston
Manager
SprayTek Inc.
2535 Wolcott
Ferdale, MI 48220

Dear Mr. Hairston:

VIOLATION NOTICE

On February 25, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of SprayTek Inc. located at 2535 Wolcott, Ferdale, Michigan. The purpose of this inspection was to determine SprayTek'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 143-04C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Batch 1, Spray Booth	R 336.1201(1)	Permittee exceeded the use rate limit of 200 gallons, as applied, minus water, per month during May, June, September, and October 2019. Monthly coating use rates were 211, 205, 202, and 236.5 gallons respectively.
Batch 2, Spray Booth	R 336.1201(1)	Permittee exceeded the use rate limit of 200 gallons, as applied, minus water, per month during May, June, July, September, and October 2019. Monthly coating use rates were 210, 298, 202, 256 and 278 gallons respectively.

During this inspection, it was noted that SprayTek Inc. had installed and commenced operation of unpermitted equipment that is not exempt from R 336.1201(1) at this facility. The AQD staff advised SprayTek on March 5, 2020, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

Mr. Marvin Hairston
SprayTek Inc.
Page 2
March 11, 2020

A program for compliance may include a completed PTI application for the spray booth process equipment. An application form is available by request, or at the following website: <https://www.deq.state.mi.us/aps/appinfoev.shtml>

Be advised that Rule 201 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 1, 2020. 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If SprayTek 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 SprayTek. 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,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-753-3736

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. Kip Harrison, SprayTek
Ms. Susan Apczynski, SprayTek
Mr. Andrew Tatham, SprayTek