



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 11, 2020

Mr. Marvin Hairston, Manager
Spraytek, Inc.
2535 Wolcott Street
Ferndale, MI 48220

SRN: N0917, Oakland County

Dear Mr. Hairston:

VIOLATION NOTICE

On September 10, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Spraytek, Inc. located at 2535 Wolcott Street, Ferndale, 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; the conditions of Permit to Install (PTI) number 143-04C; and to investigate a recent complaint which we received on September 10, 2020, regarding foul solvent odors attributed to Spraytek's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGCOATING	PTI No. 143-04C, Special Conditions III.1, 3, and 4.; and Appendix A 2, 5, and 6.	The permittee failed to maintain measures necessary to minimize the generation of fugitive VOC emissions.
FGCOATING	R 336.1901	The permittee failed to maintain measures necessary to minimize the generation of fugitive VOC emissions resulting in an unreasonable interference with the comfortable enjoyment of life and property.

During this inspection AQD staff observed the following, which demonstrates that the permittee failed to maintain measures necessary to minimize the generation of fugitive VOC emissions:

- Paint soaked rags lying in the open on paint mixing equipment.
- Three uncovered five-gallon plastic bucket liners that were partly filled with liquid paint.

- An open 55-gallon waste drum overfilled with paint-soaked rags.
- A 55-gallon paint waste drum with a completely uncovered hazardous waste funnel.

Per this inspection, Spraytek is in violation of the following permit conditions and the Appendix A, Fugitive VOC Emissions and Odor Control Plan:

FGCOATING, Special Condition III. 1, which states in part, *“The permittee shall capture all waste coatings and shall store them in closed containers.”*

FGCOATING, Special Condition III. 3, which states, *“The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.”*

FGCOATING, Special Condition III. 4, which states, *“The permittee shall maintain and operate FGCOATING according to the procedures outlined in the Fugitive VOC Emissions and Odor Control Plan attached as Appendix A.”*

Appendix A 2, which states,
“MATERIAL MIXING

- a. Mixing containers shall be covered in a manner that minimizes the emission of fugitive emissions and odors.*
- b. All containers used in the mixing process shall be sealed in a manner which minimizes the emission of VOCs and odors except when materials are being added or removed from the container.”*

Appendix A 5, which states,
“CLEAN UP

- a. Clean up solvents shall be kept in sealed containers except when in use.*
- b. Waste coatings and/or solvents shall be kept in sealed containers.*
- c. Solvent rags shall be kept in sealed containers.”* and

Appendix A 6, which states,
“DISPOSAL

- a. Drums shall be tightly sealed when being readied for disposal.*
- b. Pails, buckets and cans shall either be tightly sealed or placed in impermeable trash bags in which air has been squeezed out before tying closed.*
- c. All waste materials containing coatings and/or solvents (e.g., used filters, used rags, etc.) shall be placed in impermeable trash bags in which air has been squeezed out before tying closed.”*

Per this inspection, in the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency, and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451 and Special Conditions III.1, 3, and 4.; and Appendix A 2, 5, and 6, of FGCOATING, of PTI number 143-04C.

Mr. Marvin Hairston
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 2, 2020 (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 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, 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 violations cited above and for the cooperation that was extended to me during my inspection of September 10, 2020. 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
586-854-3244

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