



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 14, 2021

Mr. Jim Grimes
Wright Coating Technologies
1603 North Pitcher Street
Kalamazoo, Michigan 49007

SRN: N0991, Kalamazoo County

Dear Mr. Grimes:

VIOLATION NOTICE

On May 25, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Wright Coating Technologies located at 1603 North Pitcher Street, Kalamazoo, 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 Permit to Install (PTI) number 212-16;

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|----------------------------|---------------------------------------|--|
| Coating Lines (FG-Lines) | PTI # 212-16, Special Condition V.1 | Facility has not done Method 24 testing on coatings and has not obtained approval from EGLE to use manufacturer's formulation data. |
| Coating Lines (FG-Lines) | PTI # 212-16, Special Condition III.2 | Facility is burning used coating-booth filters in their burn-off ovens. This is not proper disposal and does not minimize the introduction of air contaminants to the outer air. |

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 4, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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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, 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 Wright Coating Technologies 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 number listed below.

Sincerely,

Monica Brothers

Monica Brothers
Senior Environmental Quality Analyst
Air Quality Division
269-312-2535

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