



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

June 7, 2018

Mr. Dan Martin  
Martin Products Company  
P.O. Box 269  
Sturgis, Michigan 49091

SRN: N1152, St. Joseph County

Dear Mr. Martin:

**VIOLATION NOTICE**

On May 31, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a complaint investigation of Martin Products Company (Facility), located at 66635 M-66 North, Sturgis, Michigan. The purpose of this investigation 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; the conditions of Permit to Install (PTI) No. 316-08 and 154-97; Consent Order No. 3-2009; and to investigate a recent complaint that the DEQ, AQD, received on May 14, 2018, regarding black smoke and odors attributed to the Facility's operations.

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

Process Description	Rule/Permit Condition Violated	Comments
Shot blast machine	R 336.1910 (Rule 910)	Air contaminants are being emitted outside and onto the ground.
Burn-off ovens	Special Condition (SC) 1.11 of PTI No. 316-08; SC 15 of PTI No. 154-97; Paragraph 10.A of Consent Order No. 3-2009.	Circular recording charts that record the afterburner temperature were not working.
Burn-off oven #2	SC 1.13 of PTI No. 316-08; Paragraph 10.A of Consent Order No. 3-2009.	Current listing from the manufacturer of the chemical components of each material processed in the oven was not available.
Burn-off oven #2	SC 1.3 of PTI No. 316-08; Paragraph 10.A of Consent Order No. 3-2009.	Brake shoes are being processed in the burn-off oven. Only cured

		paints, oil, or grease on metal parts, racks, and/or hangers are permitted.
Burn-off ovens	R 336.1201 (Rule 201); Paragraph 11. of Consent Order AQD No. 3-2009.	The burn-off ovens were permitted as paint burn-off ovens. Processing brake shoes in the ovens is a process modification that requires a PTI.

During the inspection, the Facility was unable to produce records of the afterburner temperature of the burn-off ovens. This is a violation of the recordkeeping specified in SC 1.11 and 15 of PTI No. 316-08 and 154-97, respectively.

The conditions of PTI No. 316-08 and 154-97 require keeping records of the afterburner temperature, which shall be made available for review upon request by the AQD staff.

During this inspection, it was noted that the Facility had commenced operation of an unpermitted process (brake shoe burn-off process) at this Facility.

A program for compliance may include a completed PTI application for the brake shoe burn-off process equipment. An application form is available by request or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 of Act 451 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment that may be a source of an air contaminant.

On May 31, 2018, the AQD staff observed a shot blast machine that had a malfunctioning dust collector. Shot blast material was seen on the ground.

This constitutes a violation of Rule 910 of Act 451, which requires that an air cleaning device shall be installed, maintained, and operated in a satisfactory manner, and in accordance with the administrative rules and existing law.

The cited SC 1.11, 1.13, and 1.3 of PTI No. 316-08 are also enforceable as Paragraph 10.A of Consent Order No. 3-2009.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 26, 2018. 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

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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 Mr. Dennis Dunlap at DEQ, 7953 Adobe Road, Kalamazoo, Michigan 49009-5025 or at [dunlapd@michigan.gov](mailto:dunlapd@michigan.gov). Also submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760, or [CamilleriJ@michigan.gov](mailto:CamilleriJ@michigan.gov).

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. 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

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Mary Douglas, DEQ