

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY GRAND RAPIDS DISTRICT OFFICE



KEITH CREAGH DIRECTOR

March 7, 2016

Mr. Dennis Kowalczyk PRS Manufacturing Co. 3745 Dykstra Drive NW Walker, Michigan 49544

SRN: N1229, Kent County

Dear Mr. Kowalczyk:

VIOLATION NOTICE

On January 27, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of PRS Manufacturing Co. located at 3745 Dykstra Drive NW, Walker, Michigan. The purpose of this inspection was to determine PRS Manufacturing Co.'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 administrative rules; the conditions of Permit to Install (PTI) number 915-85A; and Consent Order AQD number 56-2014.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|-----------------------|---|--|
| EU-STRIPOVEN | PTI No. 915-85A, Special Condition (SC) VI.2 | Failure to monitor the burn- off oven secondary chamber afterburner and record the temperature at least three (3) times per batch. |
| Dip Tank Coating Line | Rule 201 | Failure to keep the required records for the Rule 287 (C) permit exemption. |

During this inspection, PRS Manufacturing Co. was unable to produce temperature records for the burn-off oven's secondary chamber afterburner. This is a violation of the recordkeeping requirements specified in SC VI.2 of PTI number 915-85A.

Additionally, during this inspection, it was noted that PRS Manufacturing Co. had commenced operation of an unpermitted paint dip tank at this facility. The AQD staff advised PRS Manufacturing Co. on January 27, 2016, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the Dip Tank Coating Line equipment. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

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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 March 28 (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.

If PRS Manufacturing Co. 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 PRS Manufacturing Co. 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.

Kaitlyn De∜ries Environmental Quality Analyst Air Quality Division 616-356-0003

cc: Ms. Prudy Blue, DEQ cc/via e-mail: Ms. Lynn Fiedler, DEQ Ms. Teresa Seidel, DEQ Ms. Heidi Hollenbach, DEQ Mr. Thomas Hess, DEQ