



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



DAN WYANT  
DIRECTOR

March 29, 2016

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Larry Gatt, CEO  
Lapeer Plating and Plastics  
395 Demille Road  
Lapeer, Michigan 48846

SRN: N1863, Lapeer County

Dear Mr. Gatt:

**VIOLATION NOTICE**

On March 22, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection at Lapeer Plating and Plastics (LPP) located at 395 Demille Road, Lapeer. The purpose of this inspection was to determine your 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); Title 40 Code of Federal Regulations Part 63 (40CFR63), Subpart N; Consent Order AQD No. 27-2015; the administrative rules and the conditions of Permit to Install (PTI) number 25-13; and General Permit 11-33.

From inspection observations and records obtained during the inspection, staff noted the following violations:

Process Description	Violation Number	Rule/Permit Condition Violated	Comments
FG-COATING	1	Condition 9.D. of Consent Order AQD 27-2015 and Special Condition IV.2. of General Permit 11-13.	Booth filter removed while paint operations were occurring.
EU-CHROMEPLATE32	2	Condition 9.A. of Consent Order AQD 27-2015.	Malfunction Abatement Plan (MAP) has not been updated to current practices.
EU-CHROMEETCH	3	Condition 9.A. of Consent Order AQD 27-2015.	Malfunction Abatement Plan (MAP) has not been updated to current practices.
EU-CHROMEPLATE32	4	40CFR63 Subpart N table 1 CMP paragraph 4 and PTI 25-13 Special Conditions IV.1., VI.2.e), and VI.3.	CMP Wash-downs not being recorded properly, missing dates.

EU-CHROMEETCH	5	40CFR63 Subpart N table 1 CMP paragraph 4 and PTI 25-13 Special Conditions III.2. and VI.4.e).	CMP wash-downs not being recorded properly, missing dates.
FG-FACILITY	6	PTI 25-13 Special Conditions I.1, VI.1. and VI.2.a) through e).	Individual HAP emissions are not being tracked or recorded.
FG-FACILITY	7	PTI 25-13 Special Conditions I.2., VI.1. and VI.2.a) through e).	Aggregate HAP emissions are not being tracked or recorded.

Violation description as numbered in the above table:

1. Inspector observed operation of HPLV booths within FG-COATING line without the proper installation of a ventilation filter. This constitutes a violation of Special Condition IV.2. of General Permit 11-13 which states, "The permittee shall not operate any spray application unless particulate control (dry filters or a water curtain) is installed, maintained and operated in a satisfactory manner. (R 336.1331)".
2. The current EU-CHROMEPLATE32 Maintenance Abatement Plan (MAP) was to be updated in accordance with condition 9.A. of Consent Order AQD 27-2015. Upon inspection, the MAP on file is dated January 5, 2008, and is outdated with current practices, personnel, and current MSDS information.
3. The current EU-CHROMEETCH Maintenance Abatement Plan (MAP) was to be updated in accordance with condition 9.A. of Consent Order AQD 27-2015. Upon inspection, the MAP on file is dated January 5, 2008, and is outdated with current practices, personnel, and current MSDS information.
4. The hard copy scrubber maintenance records for EU-CHROMEPLATE32 are missing documentation of composite mesh pad wash-downs in accordance with Special Conditions IV.1., VI.2.e) and VI.3. between the dates of November 10, 2015 and December 20, 2015. This requirement is performed on a weekly basis, thus was not documented for a period of six (6) weeks.
5. The hard copy scrubber maintenance records for EU-CHROMEETCH are missing documentation of composite mesh pad wash-downs in accordance with Special Conditions III.2. and VI.4.e). The document for the EU-CHROMEETCH wash-downs had only one date on it, January 24, 2016. This requirement is performed on a weekly basis, thus was not documented for a period of all but one week since the last inspection.
6. PTI 25-13 has an Individual HAP emission limit for FG-FACILITY. This limit is based on a 12 month rolling time period and is required to be determined at the end of each calendar month. This limit is not being track or recorded as per Special Conditions I.1, VI.1. and VI.2.a) through e).

7. PTI 25-13 has an Aggregate HAP emission limit for FG-FACILITY. This limit is based on a 12 month rolling time period and is required to be determined at the end of each calendar month. This limit is not being track or recorded as per Special Conditions I.2, VI.1. and VI.2.a) through e).

In reference to the violations identified in this letter, please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 26, 2016. 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 Lapeer Plating and Plastics 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 your facility. 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 or at [HUDEN@michigan.gov](mailto:HUDEN@michigan.gov).

Sincerely,



Nathan Hude  
Environmental Quality Analyst  
Air Quality Division  
517-284-6779

NNH:TG

cc: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Brad Myott, DEQ

