



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

August 30, 2018

Mr. Jason Lewicki
Complete Filtration
1776 W. Clarkston Road
Lake Orion, MI 48362

SRN: N2070, Oakland County

Dear Mr. Lewicki:

VIOLATION NOTICE

On August 14, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Complete Filtration located at 1776 W. Clarkston Road, Lake Orion, Michigan. The purpose of this inspection was to determine Complete Filtration'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); and the Air Pollution Control Rules.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------------|--------------------------------|--|
| Adhesive Application Line | R 336.1201 | Adhesive Application Line used to glue cylindrical fabric filters onto frames. Adhesive usage exceeds two gallons per day. |

During this inspection, it was noted that Complete Filtration had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Complete Filtration on August 21, 2018, that this is a violation of Rule 201 of Act 451.

A program for compliance may include a completed PTI application for the Adhesive Application process equipment. An application form is available by request, or at the following website: 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 which may be a source of an air contaminant. Please initiate actions necessary to correct the cited Violation and submit a written response to this Violation Notice by September 20, 2018 (which coincides with 21

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calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Complete Filtration 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 violation cited above and for the cooperation that was extended to me during my inspection of Complete Filtration. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Bognar
Environmental Quality Analyst
Air Quality Division
586-753-3744

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ