



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 23, 2022

Dave Bacon, President
Plasti-Paint Incorporated
801 Woodside Drive
Saint Louis, Michigan 48880

SRN: N2422, Gratiot County

Dear Dave Bacon:

VIOLATION NOTICE

On June 29, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Plasti-Paint Incorporated, located at 801 Woodside Dr., Saint Louis, Michigan. The purpose of this inspection was to determine 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) numbers 568-97D and 145-19.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUB01 - One batch natural gas-fired burnoff oven with a primary chamber fuel capacity of 325,000 Btu/hr and a secondary chamber (afterburner) capacity of 475,000 Btu/hr.	PTI 145-19, Special Condition (SC) IV.1 which requires satisfactory operation of the afterburner as maintaining a minimum temperature of 1400°F.	The paper wheel temperature record located on the side of EUB01 was showing afterburner temperatures of ~1300°F for 5 runs.

Temperatures in EUB01 are required to be continuously monitored and recorded in a temperature control system operated in a satisfactory manner per SCs IV. 2 and 3. Temperatures are monitored using a paper chart recorder. On the day of the inspection, the paper wheel recorder was showing afterburner temperatures of approximately 1300°F for 5 runs. A spot check of the paper wheels for January 2022 to June 2022, all showed that the afterburner was operating between 1200°F to 1300°F which is less than the minimum temperature of 1400°F. PTI 145-19 requires a minimum afterburner temperature of 1400°F per SC IV.1. It appears that the afterburner is not being operated in a satisfactory manner in violation of PTI 145-19, SC IV.1.

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This, at a minimum, constitutes a violation of Rule 910 of the administrative rules promulgated under 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.

After the inspection, facility staff provided the following information:

- The thermocouple was found to be clean and in good working condition.
- The afterburner set point was well above the 1400°F minimum temperature.
- The gas valve was inspected and found to be dirty and potentially sticking, causing restricted flow.
- The gas valve was cleaned, and the afterburner temperature was again reaching the 1400°F minimum temperature. (Picture of paper wheel showing afterburner temperatures at 1400°F emailed on July 6th.)
- As a result, a PM has been created for regular review/sign-off of the temperature wheels to verify proper and satisfactory operation.

If Plastic-Paint Inc. 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 Plastic-Paint Inc. 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,



Julie L. Brunner, P.E.
Environmental Quality Specialist
Air Quality Division
517-275-0415

cc: Jameson Evitts, Plastic-Paint Inc.
Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE