



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

January 19, 2024

VIA EMAIL

Daniel Kellogg, EHS Supervisor
Spartan Fire Chassis
1663 Reynolds Road
Charlotte, Michigan 48813

SRN: N2503, Eaton County

Dear Daniel Kellogg:

VIOLATION NOTICE

On November 14, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Spartan Fire Chassis located at 1663 Reynolds Road, Charlotte, Michigan. The purpose of this inspection was to determine Spartan Fire Chassis'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; and the conditions of Permit to Install (PTI) number 112-09.

During the records review following the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGPAINTBOOTHS	PTI 112-09, Monitoring/Recordkeeping Special Condition VI.3 a - d	Spartan Fire failed to provide the following records for January 2021 – September 2023: Gallons (with water) of each coating material and solvent-containing material used; the VOC content (minus water and with water) of each coating material and solvent-containing material used; the monthly and 12-month rolling VOC mass emission calculations for each booth in FGPAINTBOOTHS

FGFACILITY	PTI 112-09, Monitoring/Recordkeeping Special Condition VI.2 a, c - e	Spartan Fire failed to provide the following records for January 2021 – September 2023: The quantity, in gallons or pounds, of each HAP-containing material used on a monthly basis; the HAP content, in lb/gal or lb/lb, of each HAP-containing material used; the individual HAP emission calculations (monthly and 12-month rolling); aggregate HAP emission calculations (monthly and 12-month rolling basis).
FGFACILITY	PTI 112-09, Monitoring/Recordkeeping condition VI.3 a, c - e	Spartan Fire failed to provide the following records for January 2021 – September 2023: The quantity, in gallons or pounds of each VOC-containing material used on a daily basis; the VOC content, in lb/gal or lb/lb, of each VOC-containing material used; the VOC emission calculations on a monthly and 12-month rolling basis.

Spartan Fire Chassis was unable to produce the records requested after the November 14, 2023, inspection. I requested the above records for January 2021 – September 2023 on November 15, 2023, asking that they be submitted by November 27, 2023. Records were not provided, and an extension of December 1, 2023, was granted. By December 4, 2023, the records were still not provided. On December 8, 2023, spreadsheets containing what appeared to be total monthly VOC and HAP tracking for January 2021 – September 2023 were provided; however, the records were incomplete, as noted in the deficiencies in the table, above. An email and a phone call were made to the company on January 3, 2024, noting the

deficiencies in the provided recordkeeping and requesting additional records. An additional phone call was made to the company on January 4, 2024. As of January 10, 2024, the AQD has not received a response from the Spartan Fire concerning the January 3, 2024, request.

Failure to provide the requested records is a violation of the recordkeeping requirements specified in the following of PTI 112-09:

FGPAINTBOOTHS

- The quantity in gallons of each coating and solvent-containing material used (monthly) (SC VI.3.a)
- The VOC content with and without water for each coating and solvent-containing material as applied (SC VI.3.b)
- The monthly VOC emission calculations per paint booth (SC VI.3.c)
- The 12-month rolling VOC emissions per paint booth (SC VI.3.d)

FGFACILITY

- The quantity, in gallons or pounds, of each HAP-containing material used on a monthly basis (SC VI.2.a)
- The HAP content, in lb/gal or lb/lb, of each HAP-containing material used (SC VI.2.c)
- The individual HAP emission calculations on a monthly and 12-month rolling basis (SC VI.2.d)
- The aggregate HAP emission calculations on a monthly and 12-month rolling basis (SC VI.2.d)
- The quantity, in gallons or pounds of each VOC-containing material used on a daily basis (SC VI.3.a)
- The VOC content, in lb/gal or lb/lb, of each VOC-containing material used (SC VI.3.c)
- VOC emission calculations on a monthly and 12-month rolling basis (SC VI.3.d and VI.3.e)

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 9, 2024, (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.

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The written response shall also include the following:

All records which were requested in the November 15, 2023, Records Request email (attached), including manufacturer's formulation data (TDS or EDS) and Safety Data Sheets) for the top-10 most-used coatings. The TDS or EDS must contain the VOC content, HAP content, water content, and density of each VOC- and HAP-containing material.

Please submit the written response to Michelle Luplow at EGLE, AQD, Lansing District, at 525 West Allegan, First Floor South, Lansing, Michigan 48933 or LuplowM1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Spartan Fire Chassis 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 Spartan Fire Chassis. 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,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-294-9294

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE