



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

January 29, 2018

Mr. Jamie Downs  
Downs Industries  
715 North Main Street  
Lawton, Michigan 49065

SRN: N2739, VanBuren County

Dear Mr. Downs:

**VIOLATION NOTICE**

On January 17, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Downs Industries (Facility), located at 715 North Main Street, Lawton, Michigan. The purpose of this inspection was to determine the 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); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) No. 748-90A.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Recordkeeping	PTI No. 748-90A, Special Condition 19 a, b, c	Volatile Organic Compound (VOC) and styrene content in resin, gel coat, catalyst, and cleanup solvent not recorded.
Recordkeeping	PTI No. 748-90A, Special Condition e	Emission calculations incomplete for styrene and VOC emission rates.

During this inspection, the Facility was unable to produce complete emission records for VOC and styrene emissions.

This is a violation of the recordkeeping and emission limitations specified in Special Condition 19 a, b, c, and e of PTI No. 748-90A.

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The conditions of PTI No. 748-90A requires amount of resin and gel coat used, and its VOC and styrene content in pounds per gallon used. Because of this, Special Conditions 13 and 14 could not be evaluated for compliance.

The Facility was able to provide usage records and hours of operations. Based on these records, staff of the AQD was able to verify additional PTI No. 748-90A Special Conditions 15 and 18 violations. There were hourly, monthly, and 12-month yearly overages for gel coat, resin, and acetone used. These were not sited in the Violation Notice since the Facility no longer produces at those levels, and there has not been an overage since October 2016.

It is highly recommended the Facility void the existing permit and obtain a new permit to accurately reflect current operations and future production levels.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 19, 2018 (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 the Facility 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 the 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.

Sincerely,



Amanda Chapel  
Environmental Quality Analyst  
Air Quality Division  
269-910-2109

AC:CF  
Enclosure

cc: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Mary Douglas, DEQ