



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

January 24, 2019

Ms. Laura Crawford, EHS Manager
Lapeer Industries, Inc.
290 McCormick Drive
Lapeer, Michigan 48446

SRN: N3090, Lapeer County

Dear Ms. Crawford:

VIOLATION NOTICE

On August 21, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Lapeer Industries Inc., Plant 2 (Lapeer Industries) located at 290 McCormick Drive, Lapeer, Michigan. The purpose of this inspection was to determine Lapeer Industries' 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
Primer booth with shared curing oven	201	Reported coating usage has at times exceeded the 200 gallons per month exemption threshold of Rule 287.
Paint booth with shared curing oven	201	Reported coating usage has at times exceeded the 200 gallon per month exemption threshold of Rule 287.

During this inspection, it was noted that Lapeer Industries has an existing primer booth and a paint booth, with a shared curing oven, at this facility. In past years, these have previously been operated as exempt from the requirement of Rule 201 to obtain a permit to install, under the Rule 287 exemption for surface coating lines. To determine if these processes still met the criteria for the Rule 287 exemption, AQD requested copies of coating throughput for the booths. Coating and solvent use records, which were forwarded to AQD on September 26, 2018, indicated that during July through August of 2018, monthly coating usage exceeded 200 gallons per booth. The Rule 287(2)(c) exemption for coating lines allows for coating lines to be considered exempt from needing a permit to install (PTI), if they do not exceed 200 gallons of coatings, minus water, per month.

The AQD staff advised Lapeer Industries on January 23, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

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A program for compliance may include a completed PTI application for the primer booth and paint booth 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). A streamlined general permit may be an option for these two coating lines.

Be advised that Rule 201 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 violations and submit a written response to this Violation Notice by February 14, 2019. 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.

Please submit the written response to the DEQ, AQD, Lansing District, at Constitution Hall, 525 West Allegan, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Lapeer Industries 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 Lapeer Industries. 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,

A handwritten signature in black ink, appearing to read "Daniel A. McGeen for".

Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-284-6638

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Brad Myott, DEQ