



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

June 20, 2016

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Larry Griswold
Body Shop Manager
Hank Graff Chevrolet
800 North State Road
P.O. Box 430
Davison, Michigan 48423

SRN: N3210, Genesee County

Dear Mr. Griswold:

VIOLATION NOTICE

On June 15, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Hank Graff Chevrolet (Hank Graff) located at 800 North State Road, Davison. 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 administrative rules and the conditions of Permit to Install (PTI) number 953-91.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-PAINTBOOTH	PTI 953-91 Special Condition 17	Records of coating use per month not being maintained.
FG-PAINTBOOTH	PTI 953-91 Special Condition 18	Records of VOC emission rate in lbs/hr and tons per year not being maintained.

PTI 953-91 Special Condition 17 states the following: "Applicant shall not use more than 291 gallons of coating and reducer per calendar month. A calendar month record of the coating and reducer usage shall be kept on file for a period of at least two years and made available to the Air Quality Division upon request." During this inspection, Hank Graff representatives were unable to produce paint and reducer usage records. Based on this, it is assumed that records of paint usage have not been maintained and are unavailable.

PTI 953-91 Special Condition 18 states the following: "The volatile organic compound emission rate from the paint booths shall not exceed 15 pounds per hour nor 9 tons per year." During this inspection, Hank Graff representatives were unable to produce emission records. Based on this, it is assumed records of emission calculations have not been kept, nor have they been computed in order to determine compliance with this condition.

It should also be noted that this process may also be subject to the federal Nation Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. These standards are found in 40 CFR Part 63, Subpart HHHHHH. Due to the State of Michigan not being granted delegation of this regulation, the inspection did not identify the specific requirements for compliance. I encourage you to research this regulation to determine if there are conditions of compliance or requirements of your facility that are required to be reported to US EPA.

Enclosed is a copy of PTI 953-91 and 40CFR63 HHHHHH as cited above; further information regarding the NESHAP regulation can be found at:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=ceba3b94062c17bcf02d23e28195132b&mc=true&node=sp40.15.63.hhhhhh&rqn=div6>

Additional information regarding 40CFR63 HHHHHH can be found at:

http://www.michigan.gov/deq/0,4561,7-135-3310_70317-192582--,00.html

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 11, 2016. The written response should include: the dates or timeframe in which 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 Hank Graff 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 Hank Graff. If you have any questions regarding the cited violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Nathan Hude
Environmental Quality Analyst
Air Quality Division
517-284-6779

NNH:TG

Enclosures

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ