



May 8, 2015

Mr. Kevin Williams
 Diversified Fabricators, Inc.
 21482 Carlo Drive
 Clinton Township, MI 48038

SRN: N3686, Macomb County

Dear Mr. Williams:

VIOLATION NOTICE

On April 16, 2015 and May 1, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Diversified Fabricators, Inc. (DFI) located at 21482 Carlo Drive, Clinton Township, Michigan. The purpose of this inspection was to determine DFI'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 administrative rules and the conditions of Permit to Install (PTI) number 154-93.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
CNC laser metal cutting	R 336.1201 (Rule 201)	Externally exhausted metal cutting equipment not permitted
Paint booth	PTI No. 154-93 Special Condition 15	Hourly emission limit exceeded

- EMISSIONS REPORTED

The conditions of PTI number 154-39 limit the emissions of volatile organic compounds to 2.48 pounds per hour. According to the records submitted by DFI, the calculated volatile organic compounds emissions for April 2013 through March 2014 were 3.28 lbs/hr.

A program for compliance may include voiding PTI number 154-93. The paint booth may be exempt from R 336.1201 by R 336.1287(c) which states: The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

- (c) A surface coating line if all of the following conditions are met:
 - (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
 - (ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
 - (iii) Monthly coating use records are maintained on file for the most recent two-year period and are made available to the air quality division upon request.

- RULE 201 VIOLATION

During this inspection, DEQ staff observed an unpermitted CNC laser metal cutting machine in operation at DFI. This laser metal cutting machine is externally vented. The vent has shutters and a catch basin that may be considered a mechanical precleaner. There is no fabric filter connected to the ventilation for this laser cutter. Exemption R 336.1285(l)(vi) requires both a mechanical precleaner and a fabric filter. The AQD staff advised Kevin Williams on May 4, 2015, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the CNC laser metal cutting process equipment. An application form is available by request, or at the following website:

http://www.deq.state.mi.us/aps/nsr_information.shtml

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.

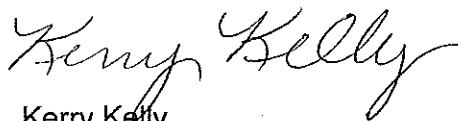
- RESPONSE/COMPLIANCE PROGRAM/CONCLUSION

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 29, 2015 (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 is 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 DFI 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 DFI. 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,



Kerry Kelly
Environmental Quality Analyst
Air Quality Division
586-753-3746

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ