

## STATE OF MICHIGAN

## DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

KALAMAZOO DISTRICT OFFICE



October 14, 2019

Mr. Don Schmidtke Consolidated Stripping & Derusting 942 Industrial Parkway Plainwell, Michigan 49080

Dear Mr. Schmidtke:

SRN: N3689, Allegan County

## **VIOLATION NOTICE**

On August 29, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Consolidated Stripping & Derusting located at 942 Industrial Parkway, Plainwell, Michigan. The purpose of this inspection was to determine Consolidated Stripping & Derusting'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 173-93;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Line	Rule 201	The facility had a coating line that was applying paint with a spray gun outside with no particulate matter controls. The facility also did not maintain records that showed the coating usage per month. Rule 287(2)(c) requires that monthly coating usage records be maintained on file for 2 years and made available at the departments request. Rule 287(2)(c) requires that a coating line that exhaust outside be equipped with a dry filter control or water wash equipment.

During this inspection, it was noted that Consolidated Stripping & Derusting had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Consolidated Stripping & Derusting on August 29, 2019, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the coating line process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 4, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Consolidated Stripping & Derusting 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 violation cited above and for the cooperation that was extended to me during my inspection of Consolidated Stripping & Derusting. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Cody Yazzie

Environmental Engineer Air Quality Division 269-567-3554

## Enclosure

cc: Ms. Mary Ann Dolehanty, EGLE Dr. Eduardo Olaguer, EGLE Ms. Jenine Camilleri, EGLE

Mr. Christopher Ethridge, EGLE

Mr. Rex Lane, EGLE