



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



DANIEL EICHINGER
ACTING DIRECTOR

April 17, 2023

Mark Piersma
The Decc Company
1266 Wallen SW
Grand Rapids, Michigan 49507

SRN: N3751, Kent County

Dear Mark Piersma:

VIOLATION NOTICE

On March 7, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of The Decc Company located at 1266 Wallen SW, Grand Rapids, Michigan. The purpose of this inspection was to determine The Decc Company'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) numbers 183-93, 167-18, 7-07B, and 87-09.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Rack burn-off oven (EURBO2)	PTI No. 167-18, Special Condition I.2	Visible emissions observed from oven stack.
Rack burn-off oven (EURBO2)	PTI No. 167-18, Special Condition IV.1	Failure to properly operate burn-off oven afterburner.
FG-COATING	General PTI No. 87-09, Special Condition III.1	Failure to capture all purge/clean-up solvents in closed containers and dispose of them in an acceptable manner.
FG-COATING	General PTI No. 87-09, Special Condition VI.3	Failure to maintain records of purge/clean-up solvent used and reclaimed.
FGFACILITY	Opt-out PTI No. 7-07B, Special Condition VI.2	Failure to properly calculate Hazardous Air Pollutant (HAP) emissions.

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During this inspection it was observed that The Decc Company rack burn-off oven (EURBO2) was emitting smoke. This is a violation of PTI No. 167-18, Special Condition (SC) I.2, which prohibits visible emissions. During an internal review, The Decc Company found that an oven door seal was compromised, allowing more oxygen into the oven than normal. The records indicated that the afterburner shuts down while the main chamber oven is above 900°F. This is not considered proper operation, and the afterburner must remain at the required temperature while combustion is occurring in the oven. As such, this is a violation of PTI No. 167-18, SC IV.1.

Due to the above conditions, and pursuant to Rule 911, the AQD requests that The Decc Company prepare and submit a Preventative Maintenance and Malfunction Abatement Plan for both rack burn-off ovens EURBO1 and EURBO2. This plan shall be submitted to the AQD District Supervisor within 45 days of the date of this letter.

The use of purge/clean-up solvent and the amount being reclaimed is not being tracked in accordance with General PTI No. 87-09 which is a violation of SC VI.3. In addition, it is noted that in 2019 the AQD discussed that spraying solvent into the filter of the paint booth is not considered proper disposal, yet that practice continues. This is a violation of PTI No. 87-09, SC III.1.

Additionally, during this inspection it was identified that The Decc Company did not include the hydrogen fluoride (HF) emissions that are generated from the burn-off ovens (EURBO1 and EURBO2) in the FGFACILITY recordkeeping as required by PTI No. 7-07B. This deficiency was identified during the previous compliance inspection in 2019 and was included in the compliance summary section of the inspection report. Because the HF emissions have not been incorporated into the recordkeeping, this is a violation of PTI No. 7-07B, SC VI.2.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 8, 2023 (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.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If The Decc Company 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 Decc Company. 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,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE