

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



SRN: N5656, Macomb County

August 29, 2022

VIA E-MAIL AND U.S. MAIL

Martin Lewis, General Manager Nylok LLC 15260 Hallmark Court Macomb, Michigan 48042

Dear Martin Lewis:

VIOLATION NOTICE

On July 12, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Nylok LLC located at 15260 Hallmark Court, Macomb, Michigan. The purpose of this inspection was to determine Nylok LLC'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 Renewable Operating Permit (ROP) number MI-ROP-N5656-2020.

During the inspection, staff observed the following:

	Rule/Permit	
Process Description	Condition Violated	Comments
FG-COATINGLINEA	FG-COATINGLINEA SC IV.1, FG-MACT MMMM SC III.1, and FG-MACT MMMM SC VI.4	Records showing the RTO three-hour rolling and block average temperatures were less than 1550 F between August 18, 2021 and August 20, 2021.
FG-COATINGLINEA	FG-COATINGLINEA SC VI.8, FG-MACT MMMM SC VI.4	Nylok failed to conduct PTE pressure sensor calibrations quarterly and leak checks monthly.
FG-COATINGLINEA	FG-COATINGLINEA SC VII.5, FG-MACT MMMM SC VII.6.b	Nylok did not report the RTO temperature exursion/deviation that occurred August 18, 2021 – August 20, 2021.

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This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for for Surface Coating of Miscellaneous Metal Parts and Products. These standards are found in 40 CFR Part 63, Subpart MMMM.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 19, 2022 (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, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Nylok LLC 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 Nylok LLC. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,

Kerry Kelly

Senior Environmental Quality Analyst

Air Quality Division

586-506-9817; kellyk6@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE