



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

August 27, 2014

Mr. Tim Reedy
General Manager
Eagle Ottawa Rochester Hills, LLC
2930 West Auburn Road
Rochester Hills, Michigan 48309-3505

SRN: N5677, Oakland (63) County

Dear Mr. Reedy:

VIOLATION NOTICE

Under the State of Michigan's Air Pollution Control law and the federal Clean Air Act, a Renewable Operating Permit (ROP) program has been developed and implemented in Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(5) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), requires major sources to submit an application to the Department of Environmental Quality (DEQ), Air Quality Division (AQD) not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

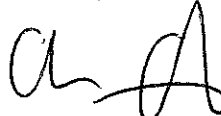
Based on the commencement of operation of Eagle Ottawa Rochester Hills, LLC located at 2930 West Auburn Road, Rochester Hills, Michigan 48309-3505, an application for a ROP should have been submitted to the AQD according the schedule of Rule 336.1210; within 12 months of becoming a major source. Eagle Ottawa became a major source about June 2012 by exceeding major source threshold of 100 tons per year for a criteria pollutant; Potential-to-Emit for VOC emissions is about four hundred (390) tons per year taking into account the permit (PTI No. 433-95A) restriction of 67 tons per year for permitted coating lines. To date, the AQD has not received this application. This constitutes a violation of Rule 210(1) of Act 451 which requires that a source not operate any emission units at a source required to obtain a ROP unless a timely and administratively complete application has been received by the DEQ. As a result of the failure to submit a timely and administratively complete application in accordance with the requirements of Rule 210(5) of Act 451, this facility has failed to obtain an "application shield".

Please submit a complete application within (60) days from the date of this letter or promptly revise existing permit as an ROP and MACT synthetic minor permit (PTI No. 433-95A → PTI No. 433-95B). In addition, Eagle Ottawa may resolve all outstanding violations via consent order and civil settlement.

If Eagle Ottawa 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.

If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact Iranna Konanahalli at 586-753-3741 or konanahalli@michigan.gov, or you may contact me at the number listed below.

Sincerely,



Christopher Ethridge
Southeast Michigan District Supervisor
Air Quality Division
586-753-3740

CE/DC

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Dennis McGeen, DEQ
Mr. Iranna Konanahalli, DEQ