

## STATE OF MICHIGAN

## DEPARTMENT OF ENVIRONMENTAL QUALITY





January 24, 2018

Mr. Andy Bereza, Operations Manager Seaver Finishing E-Coat Division 16900 Hayes Street Grand Haven, Michigan 49417

Dear Mr. Bereza:

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SRN: N5687, Ottawa County

On January 5, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Seaver Finishing E-Coat Division (Seaver) located at 16900 Hayes Street, Grand Haven, Michigan. The purpose of this inspection was to determine Seaver'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 166-10 and 397-95.

**VIOLATION NOTICE** 

During the inspection, staff observed the following:

| Process Description  | Rule/Permit<br>Condition Violated            | Comments  |
|----------------------|--|---|
| Burnoff oven         | Rule 201                                     | The facility installed and operated a fourth burnoff oven without a permit to install.  |
| VOC material content | PTI No. 397-95,<br>Special Condition (SC) 14 | The facility is using a coating with the VOC content of 0.48 lbs. per gallon (minus water) in exceedance of the 0.27 lbs. per gallon (minus water) permitted limit. |

The records provided demonstrate that actual emissions of volatile organic compounds (VOC) from the E-coat process equipment are 0.48 lbs. per gallon (minus water) as applied. The conditions of PTI No. 397-95, SC 14 limit the emissions of VOCs to 0.27 lbs. per gallon (minus water) as applied.

During this inspection, it was noted that Seaver had installed and commenced operation of an unpermitted burnoff oven at this facility. The AQD staff advised Seaver on January 5, 2018, that this is a violation of Act 451, Rule 201.

Mr. Andy Bereza Seaver Finishing E Coat Division Page 2 January 24, 2018

A program for compliance may include a completed PTI application/modification for the burnoff oven process equipment. An application form is available by request, or at the following website: www.michigan.gov/deqair (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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 14, 2018 (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.

If Seaver 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 Seaver Finishing E-Coat Division. 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.

Tyler Salamasick

**Environmental Quality Analyst** 

Air Quality Division

616-558-1281

cc: Ms. Heidi Hollenbach, DEQ

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Mr. Chris Ethridge, DEQ Mr. Thomas Hess, DEQ