



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GRETHUR
DIRECTOR

January 31, 2017

Mr. Alan Popp
Enviro Tech Coatings
1900 Austin Street
Midland, Michigan 48642

SRN: N6801, Midland County

Dear Mr. Popp:

VIOLATION NOTICE

On January 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Enviro Tech Coatings located at 1900 Austin Street, Midland, Michigan. The purpose of this inspection was to determine Enviro Tech Coating'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 52-00C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Maintaining records for a period of five years	VI. Monitoring and Record Keeping Records shall be maintained on file for a period of five years	The permittee failed to maintain records for a period of five years. Records are being disposed of after 12 months
Maintain monthly usage rates in gallons of all reducers and purge/clean-up solvents for EUSPRAYBOOTH3	EUSPRAYBOOTH3 VI. 3. The permittee shall keep the following information on a calendar month basis for EUSPRAYBOOTH3: b) Usage rate in gallons of all reducers and purge/clean-up solvents	The permittee failed to maintain monthly usage rates in gallons of all reducers and purge/clean-up solvents for EUSPRAYBOOTH3

Maintaining VOC records on a monthly basis for EUSPRAYBOOTH3	EUSPRAYBOOTH3 VI. 3. The permittee shall keep the following information on a calendar month basis for EUSPRAYBOOTH3: c) Monthly record of the VOC content in pounds per gallon of each coating and the usage rate in gallons.	The permittee failed to maintain monthly coating usage rate records in gallons for EUSPRAYBOOTH3
Maintaining VOC emission rate records on a monthly and 12 month rolling time period basis for EUSPRAYBOOTH3	EUSPRAYBOOTH3 VI. 3. d) Monthly and annual VOC emission rate calculations for a coating line and any associated purge and clean-up operations, in pounds per 12-month rolling time period, using the method specified in Appendix A.	The permittee failed to maintain monthly and annual emission rate calculations for EUSPRAYBOOTH3 in pounds per 12-month rolling time period
Maintain monthly usage rates in gallons of all reducers and purge/clean-up solvents for EUSPRAYBOOTH1 and EUSPRAYBOOTH2, separately	FGSPRAYBOOTH3 VI. 3. The permittee shall keep the following information on a calendar month basis separately for EUSPRAYBOOTH1 and EUSPRAYBOOTH2: b) Usage rate in gallons of all reducers and purge/clean-up solvents.	The permittee failed to maintain monthly usage rates in gallons of all reducers and purge/clean-up solvents for EUSPRAYBOOTH1 and EUSPRAYBOOTH2, separately
Maintaining VOC records on a monthly basis for EUSPRAYBOOTH1 and EUSPRAYBOOTH2	FGSPRAYBOOTH3 VI. 3. The permittee shall keep the following information on a calendar month basis separately for EUSPRAYBOOTH1 and EUSPRAYBOOTH2 c) Monthly record of the VOC content in lbs/gallon of each coating and the usage rate in gallons	The permittee failed to maintain monthly record of the usage rate in gallons for EUSPRAYBOOTH1 and EUSPRAYBOOTH2, separately

Maintaining VOC emission rate records on a monthly and 12 month rolling time period basis for EUSPRAYBOOTH1 and EUSPRAYBOOTH2	FGSPRAYBOOTH VI. 3. The permittee shall keep the following information on a calendar month basis separately for EUSPRAYBOOTH1 and EUSPRAYBOOTH2 d) Monthly and annual VOC emission rate calculations for each coating line in lbs/month and tons/12 mo. rolling time period	The permittee failed to maintain monthly and annual VOC emission rate calculations for EUSPRAYBOOTH1 and EUSPRAYBOOTH2, separately
Maintain individual HAP emission calculations determining the annual emission rate of each in tons per 12- month rolling time period	FGFACILITY VI. 2. The permittee shall keep the following information on a calendar month basis for FGFACILITY: e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12 month rolling time period	The permittee failed to maintain individual HAP emission calculations determining the annual emission rate of each HAP in tons per 12- month rolling time period

During this inspection, Enviro Tech Coatings was unable to produce emission records.

This is a violation of the recordkeeping and emission limitations specified in the Monitoring/Record Keeping sections of PTI number 52-00C.

The conditions of PTI number 52-00C require maintenance of monthly and annual VOC and HAP emission rates, which shall be made available for review upon request by the AQD staff for a period of at least 5 years.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 21, 2017 (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 Enviro Tech Coatings 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.

Mr. Alan Popp
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Enviro Tech Coatings. 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,

A handwritten signature in dark ink, appearing to read 'Sydney Bruestle', written in a cursive style.

Sydney Bruestle
Environmental Quality Analyst
Air Quality Division
989-894-6216

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Hare, DEQ