



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



KEITH CREAGH  
DIRECTOR

March 16, 2016

Mr. Tim Johnson, General Manager  
Universal Coating, Incorporated  
5204 Energy Drive  
Flint, Michigan 48505

SRN: N7256, Genesee County

Dear Mr. Johnson:

**VIOLATION NOTICE**

On November 24, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Universal Coating, Incorporated located at 5204 Energy Drive, Flint, Michigan. The purpose of this inspection was to determine 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 administrative rules and the conditions of Permit to Install (PTI) number 96-03C. This inspection resulted in a violation notice sent on January 21, 2016. During the review of the additional information provided from the site inspection questions, the violation notice response dated February 11, 2016 and the emissions reported dated February 12, 2016, staff observed the following additional violations and follow up items for previous violations:

Process Description	Rule/Permit Condition Violated	Comments
Four automatic miscellaneous metal parts spray lines	FG-CATOX special condition IV.3 (Rules 205, 702, and 910)	The previous response to this violation did not adequately address the length of time for this violation. Furthermore, the information provided in response to this item claims compliance; however, the data charts provided are still below the required 600 degrees Fahrenheit. The response should include all strip charts where the minimum oxidizer temperature of 600 degrees was not obtained.
Four automatic miscellaneous metal parts spray lines	FG-CATOX special condition I.1 (Rules 205 and 702a)	Response needs to consider no control credit for periods of operation that the oxidizer was not at the proper temperature.
Four automatic miscellaneous metal parts spray lines	FG-CATOX special condition IV.2 (Rule 702a)	We have reviewed the previous VN response and the DEQ still feels a PTI modification is needed to use spray equipment other than HVLP.
Source wide Hazardous Air Pollutant (HAP) restriction	FG-FACILITY special condition I.1 (Rule 205(1))	Exceeded 9.9 tpy HAP limit.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 6, 2016. 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 Universal Coating, Incorporated 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 violation cited above and for the cooperation that was extended to me during my inspection of November 24, 2015, and the responses provided on February 11, 2016. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Robert Byrnes  
Senior Environmental Engineer  
Air Quality Division  
517-284-6632

RB:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Ms. Heidi Hollenbach, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Brad Myott, DEQ