



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

March 21, 2017

Mr. Brian Borowski
Premier Finishes LLC
28060 Groesbeck Highway
Roseville, MI 48066-2345

SRN: N7896, Macomb County

Dear Mr. Borowski:

VIOLATION NOTICE

On February 16, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Premier Finishes LLC located at 28060 Groesbeck Highway, Roseville, Michigan. The purpose of this inspection was to determine Premier Finishes' 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 Consent Order AQD number 4-2010.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.A.1.	The Company failed to maintain an appropriately designed and operated fabric filter collector for the sand blast cleaning process.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.B.1.	The Company failed to conduct employee training on the proper operation of the sand blast cleaning process, which shall include training on the proper operation and maintenance of the air cleaning device. The Company failed to keep and maintain records that demonstrate compliance with this requirement.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.B.2.	The Company failed to perform employee training before the employee's initial operation of the sand blast cleaning process and air-cleaning device. The Company failed to keep and maintain records that

		demonstrate compliance with this requirement.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.B.3.	The Company failed to repeat training a minimum of once per six (6) months. The Company failed to keep and maintain records that demonstrate compliance with this requirement.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.1.	The Company failed to keep and maintain documents that demonstrate compliance with this employee training requirement.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.2.	The Company failed to keep and maintain daily logs of a.m. and p.m. inspections of the air cleaning device.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.3.	The Company failed to keep and maintain logs of the air cleaning device cleaning and maintenance.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.4.	The Company failed to keep and maintain daily logs of the pressure drop (in inches of water column) across the fabric filter of the air cleaning device.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.5.	The Company failed to keep and maintain weekly logs of the visible emissions from air cleaning device exhaust stack.
Sand blast cleaning process.	R 336.1910	The Company failed to maintain and operate the air-cleaning device in a satisfactory manner.
Spray booths/surface coating process.	R 336.1201(1)	The Company failed to keep coating use records to demonstrate the surface coating processes are exempt from the requirement to obtain an approved permit to install.

- CONSENT ORDER OR CONSENT JUDGMENT VIOLATIONS

Paragraphs 10.A.1, 10.B.1, 10.B.2, 10.B.3, 10.C.1, 10.C.2, 10.C.3, 10.C.4 and 10.C.5 are enforceable per Consent Order, AQD number 4-2010. Enclosed is a copy of the consent order.

		demonstrate compliance with this requirement.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.B.3.	The Company failed to repeat training a minimum of once per six (6) months. The Company failed to keep and maintain records that demonstrate compliance with this requirement.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.1.	The Company failed to keep and maintain documents that demonstrate compliance with this employee training requirement.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.2.	The Company failed to keep and maintain daily logs of a.m. and p.m. inspections of the air cleaning device.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.3.	The Company failed to keep and maintain logs of the air cleaning device cleaning and maintenance.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.4.	The Company failed to keep and maintain daily logs of the pressure drop (in inches of water column) across the fabric filter of the air cleaning device.
Sand blast cleaning process.	Consent Order AQD number 4-2010, 10.C.5.	The Company failed to keep and maintain weekly logs of the visible emissions from air cleaning device exhaust stack.
Sand blast cleaning process.	R 336.1910	The Company failed to maintain and operate the air-cleaning device in a satisfactory manner.
Spray booths/surface coating process.	R 336.1201(1)	The Company failed to keep coating use records to demonstrate the surface coating processes are exempt from the requirement to obtain an approved permit to install.

- CONSENT ORDER OR CONSENT JUDGMENT VIOLATIONS

Paragraphs 10.A.1, 10.B.1, 10.B.2, 10.B.3, 10.C.1, 10.C.2, 10.C.3, 10.C.4 and 10.C.5 are enforceable per Consent Order, AQD number 4-2010. Enclosed is a copy of the consent order.

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The Company failed to maintain an appropriately designed and operated fabric filter collector for the sand blast cleaning process as required per Consent Order AQD number 4-2010, 10.A.1.

The Company failed to conduct employee training on the proper operation of the sand blast cleaning process, which shall include training on the proper operation and maintenance of the air cleaning device per Consent Order AQD number 4-2010, 10.B.1. The Company failed to keep and maintain records that demonstrate compliance with this requirement.

The Company failed to perform employee training before the employee's initial operation of the sand blast cleaning process and air-cleaning device required per Consent Order AQD number 4-2010, 10.B.2. The Company failed to keep and maintain records that demonstrate compliance with this requirement.

The Company failed to repeat training a minimum of once per six (6) months required per Consent Order AQD number 4-2010, 10.B.3. The Company failed to keep and maintain records that demonstrate compliance with this requirement.

The Company failed to keep and maintain documents that demonstrate compliance with the employee training requirement per Consent Order AQD number 4-2010, 10.C.1.

The Company failed to keep and maintain daily logs of am and pm inspections of the air cleaning device per Consent Order AQD number 4-2010, 10.C.2.

The Company failed to keep and maintain logs of the air cleaning device cleaning and maintenance per Consent Order AQD number 4-2010, 10.C.3.

The Company failed to keep and maintain daily logs of the pressure drop (in inches of water column) across the fabric filter of the air cleaning device per Consent Order AQD number 4-2010, 10.C.4.

The Company failed to keep and maintain weekly logs of the visible emissions from air cleaning device exhaust stack per Consent Order AQD number 4-2010, 10.C.5.

On February 16, 2017, the AQD staff observed operation of the sand blast cleaning process while the control device was malfunctioning. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The Company failed to keep coating use records to demonstrate the surface coating processes are exempt from the requirement to obtain an approved permit to install per R 336.1201(1). A program for compliance may include a completed PTI application for the spray booths/surface coating 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 if the process equipment is not exempt 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 April 11, 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

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violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Premier Finishes, 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 February 16, 2017. 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,



Robert Elmouchi
Environmental Quality Analyst
Air Quality Division
586-753-3736

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