



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

September 28, 2022

VIA E-MAIL AND U.S. MAIL

Brian Borowski
Premier Finishes LLC
28060 Groesbeck Highway
Roseville, Michigan 48066-2345

SRN: N7896, Macomb County

Dear Brian Borowski:

VIOLATION NOTICE

On September 8, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), 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 LLC'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; the conditions of Permit to Install (PTI) number 36-18; and Consent Order AQD number 2019-05.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBOOTHs	PTI No. 36-18, FGBOOTHs Special Condition III.1, and Consent Order AQD No. 219-05, 9.A.1.	The permittee failed to capture all waste materials and store them in closed containers. The lid on the paint mixing room 55-gallon waste drum did not properly close, which resulted in strong solvent odors in the paint mixing room.
FGBOOTHs	PTI No. 36-18, FGBOOTHs Special Condition III. 3, and Consent Order AQD No. 219-05, 9.A.1.	The permittee failed to handle all VOC and HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions, and the permittee failed to keep containers covered at all times except when operator

		access is necessary. The lid on the paint mixing room 55-gallon waste drum did not properly close, which resulted in strong solvent odors in the paint mixing room.
FGBOOTH5	PTI No. 36-18, FGBOOTH5 Special Condition IV.1, and R 336.1910, and Consent Order AQD No. 219-05, 9.A.1.	The permittee operated EUBOOTH1 while the exhaust filters were not properly installed.
FGBOOTH5	R 336.1910	The EUBOOTH2 west spray booth air balance actuator was removed from the damper control rod and the booth air balance pressure drop gauges were inoperative.

On September 8, 2022, the AQD staff observed that the permittee failed to capture all waste materials and store them in closed containers. This constitutes a violation of PTI No. 36-18, FGBOOTH5 Special Condition III.1, which states, *“The permittee shall capture all waste materials and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.”*

On September 8, 2022, the AQD staff observed that the permittee failed to handle all VOC and HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions; and the permittee failed to keep containers covered at all times except when operator access is necessary. This constitutes a violation of PTI No. 36-18, FGBOOTH5 Special Condition III.3, which states, *“The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.”*

On September 8, 2022, the AQD staff observed that the permittee operated EUBOOTH1 while the exhaust filters were not properly installed, which provides a path for particulate material air contaminants in the exhaust to bypass the control device. This constitutes a violation of PTI No. 36-18, FGBOOTH5 Special Condition IV.1, which states, *“The permittee shall not operate FGBOOTH5 unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.”*

On September 8, 2022, the AQD staff observed that the EUBOOTH2 west spray booth air balance actuator was removed from the damper control rod and the booth air balance

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pressure drop gauges were inoperative. Furthermore, the permittee operated EUBOOTH1 while the exhaust filters were not properly installed, which allowed particulate material air contaminants to bypass the control device. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, 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 cited Special Conditions III.1, III.3 and IV.1 of PTI number 36-18 are also enforceable as paragraph 9.A.1 of Consent Order, AQD number 219-05.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 19, 2022 (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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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 Premier Finishes LLC. 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
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE