

August 16, 2023

Noshin Khan  
Environmental Engineer  
Warren Rapids District Office  
Air Quality Division  
Michigan Department of Environment, Great Lakes, and Energy  
27700 Donald Court  
Warren, MI 48092

**Response to Violation Notice, dated July 28, 2023**  
**Shelby Cabinets (SRN: N7999)**  
**Shelby Township, Michigan**

On behalf of Shelby Cabinets, Fishbeck has prepared this response to the July 28, 2023, EGLE Violation Notice (VN) related to an unpermitted coating spray booth (Booth 2). The VN alleges that Shelby Cabinets violated the following Rule:

Process Description	Rule/Permit Condition Violated	Comments
Coating spray booth	Michigan Air Pollution Control Rule 201	The facility operates two spray booths exhausting to two stacks. The facility is permitted for one spray booth exhausting through one stack.

As requested, this letter provides information regarding the referenced citations, including:

- The date the alleged violation occurred
- An explanation of the cause and duration of the alleged violation
- Whether the violation is ongoing
- A summary of the action(s) that have been taken, and/or are proposed to be taken, to correct the violation, if any
- The date(s) by which these action(s) will take place
- What steps are being taken to prevent a reoccurrence

The following information is being provided as background.

- Shelby Cabinets was issued Permit to Install (PTI) 115-08 for Booth 1 In June 2008.
- An additional coating booth with stack (Booth 2) was installed in 2014.
- An AQD Inspection took place and a violation notice was issued alleging that Booth 2 was installed without a permit.

Fishbeck reviewed coating usages from each booth. While records for both booths were combined, Shelby Cabinets provided the list of coatings typically used in Booths 1 and 2. As presented in the attached table, coating usages from the most recent two years for Booth 2 meet Rule 287(2)(c) as follows:

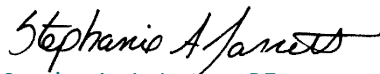
*Rule 287(2)(c) of the Michigan Air Pollution Control Rules exempts surface coating operations from the Permit to Install program if the following conditions are met:*

- 1. The coating use rate shall not be more than 200 gallons, as applied, minus water, per month;*
- 2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system; and*
- 3. Monthly coating usage records are maintained on file for the most recent two-year period and are made available to EGLE upon request. (ROP-subject sources must keep records for five years.)*

Based on the information provided by Shelby Cabinets, Booth 2 satisfies all conditions for exemption as stated in Rule 287(2)(c). Shelby Cabinets will implement a more robust record keeping tracking system to track compliance with coating usages for Booth 2.

Shelby Cabinets is committed to compliance with all environmental regulatory requirements. If you have any questions or require additional information, please contact Nikki DeClerq, of Shelby Cabinets, at 248.651.8155 ([shelbycabinets@sbcglobal.net](mailto:shelbycabinets@sbcglobal.net)) or Stephanie Jarrett, of Fishbeck, at 248.324.2146 ([sjarrett@fishbeck.com](mailto:sjarrett@fishbeck.com)).

Sincerely,



**Stephanie A. Jarrett, PE**

Vice President/Senior Environmental Engineer

Attachments

By email and UPS

Copy: Jenine Camilleri – EGLE  
Joyce Zhu – EGLE  
Nino LoChirco – Shelby Cabinets