



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

February 29, 2016

Mr. Steve Demeter
Ground Effects LLC
15200 North Commerce Drive
Dearborn, Michigan 48120

SRN: P0344, Wayne County

Dear Mr. Demeter:

VIOLATION NOTICE

On January 28, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Ground Effects LLC (Ground Effects) located at 15200 North Commerce Drive, Dearborn, Michigan. The purpose of this inspection was to determine Ground Effect'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 administrative rules and Permit to Install (PTI) number 59-12.

Following the inspection and review of required records, the AQD has identified the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-CoatingLns	PTI 59-12, FG-CoatingLns, Special Condition I. 1	VOC emissions exceed 11.0 tons per year on a 12-month rolling time period for all coating lines combined.
	PTI 59-12, FG-CoatingLns, Special Condition I. 2; R336.1702(d); R336.1621(10)(a)	VOC emissions exceed 2,000 pounds per month for each coating line.
	PTI 59-12, FG-CoatingLns, Special Condition I. 3; R336.1702(d); R336.1621(10)(a)	VOC emissions exceed 10.0 tons per year on a 12-month rolling time period for each coating line.
	PTI 59-12, FG-CoatingLns, Special Condition I. 4; R336.1224	Hexamethylene-1,6-diisocyanate (HDI) emissions exceed the daily limit (0.0037 lb/day) 52 times from April 2015 through October 2015.

FG-Facility	PTI 59-12, FG-Facility, Special Condition I. 3; R336.1702(d); R336.1621(10)(b)	VOC emissions exceed 30.0 tons per year on a 12-month rolling time period.
Heated Parts Washer	R336.1707(3)(a); R336.1707(4)	The cover on the heated parts washer was not mechanically assisted. Operational procedures were not posted.

The conditions of PTI number 59-12 limit the emissions of volatile organic compounds (VOCs) and hexamethylene-1,6-diisocyanate (HDI). Records provided on February 12, 2016 indicate that the facility has exceeded VOC and HDI emission limits.

FG-CoatingLns, Special Condition (SC) I.1 requires that VOC emissions for all combined coating lines are less than 11.0 tons per year on a 12-month rolling basis. Records provided indicate that 12-month rolling VOC emissions have regularly exceeded this limit during 2015 with VOC emissions ranging from 21.368 tons to 30.284 tons.

FG-CoatingLns, SC I.2 requires that VOC emissions are less than 2,000 pounds per month for each coating line. Records provided indicate that the 2,000 pounds per month limit was exceeded 12 times from March 2014 to September 2015. The maximum reported VOC emissions occurred during September 2015 at 3,520 pounds. This is also a violation of Rule 621(10)(a) through Rule 702(d).

FG-CoatingLns, SC I.3 requires that VOC emissions are less than 10.0 tons per year on a 12-month rolling basis for each coating line. Records provided indicate that this limit was exceeded during September 2015 (10.07 tons) and November 2015 (11.83 tons). This is also a violation of Rule 621(10)(a) through Rule 702(d).

FG-CoatingLns, SC I.4, requires that HDI emissions are less than 0.0037 pounds per day (lbs/day). Records provided indicate that daily limit was exceeded 52 times during 2015. The maximum reported HDI emission occurred on September 24, 2015 at 0.0050 lbs/day. This is also a violation of best available control technology for toxics (T-BACT) of Rule 224.

FG-Facility, SC I.3 requires that total VOC emissions from the entire facility are less than 30.0 tons per year on a 12-month rolling. Records provided indicate that this limit was exceeded during November 2015 (30.284 tons). This is also an exceedance of Rule 621(10)(b) through Rule 702(d).

Per Rule 621(10)(a), each of the three coating lines are no longer exempt from the remaining provisions of Rule 621 as described below:

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If the actual rate of emissions from an exempted metallic surface coating line exceeds 2,000 pounds per month for a subsequent month or 10.0 tons per year for a subsequent year, then the provisions of this rule shall thereafter permanently apply to the metallic surface coating line.

Additionally, during the inspection the heated parts washer was observed to be operating without a mechanically assisted cover or posted operational procedures. This is a violation of Rule 707(3)(a) and 707(4).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 21, 2016 (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 Ground Effects 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 Ground Effects. 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,



Todd Zynda, P.E.
Environmental Engineer
Air Quality Division
313-456-2761

cc: Ms. Lynn Fiedler, DEQ
Ms. Heidi Hollenbach, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ