



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

April 15, 2022

Jason Trumbull
Sebright Products
2631 12th Street
Wayland, Michigan 49344

SRN: P0401, Allegan County

Dear Mr. Trumbull:

VIOLATION NOTICE

On March 4, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Sebright Products located at 2631 12th Street, Wayland, Michigan. The purpose of this inspection was to determine Sebright Products 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

-- the conditions of General Permit to Install (PTI) number 28-15;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-COATING	Special Condition VI.3	Special Condition VI.3 requires the facility to maintain records of calculated VOC emission records. These VOC emission records are required to be determined on a calendar month and 12-month rolling basis. During the inspection Mr. Trumbull stated that the VOC emission records were not currently being kept.
Plasma Cutting	Rule 201	The facility had installed an exhaust capture system to previously installed plasma cutting operation that previously only exhausted to the general in-plant environment. During the inspection on March 4, 2022 Staff noted that the exhaust capture system that was installed exhausted out the side of the facility to atmosphere without being controlled by an appropriate fabric filter control. Staff indicated that in order for the facility to comply with Rule 285(2)(l)(vi)(B) or 285(2)(l)(vi)(C) the facility would

		need to either only exhaust to the general in-plant environment or control the exhaust with an appropriately designed fabric filter control.
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During this inspection, Sebright Products was unable to produce emission records.

This is a violation of (the recordkeeping and emission limitations) specified in Special Condition VI.3 of General PTI number 28-15.

The conditions of General PTI number 28-15 require purchase orders and invoices for all coatings which are used to calculate VOC emissions on a per calendar month and 12-month rolling basis.

Enclosed is a copy of the above cited (rule/regulation).

During this inspection, it was noted that Sebright Products had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Sebright Product on March 4, 2022, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the plasma cutting process equipment. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that 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 May 6, 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, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Jason Trumbull
Sebright Product
Page 3
April 15, 2022

If Sebright Products 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 Sebright Products. 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,



Cody Yazzie
Environmental Engineer
Air Quality Division
269-312-2754

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE