



GRETCHEN WHITMER
GOVERNOR

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



PHIL ROOS
DIRECTOR

July 11, 2023

Blake Barber, Operations Supervisor
Precise Finishing Systems, Inc.
1650 North Burkhart Road
Howell, Michigan 48855

SRN: P0805, Livingston County

Dear Blake Barber:

VIOLATION NOTICE

On March 28, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Precise Finishing Systems, Inc. located at 1650 N. Burkhart Rd., Howell, Michigan. The purpose of this inspection was to determine Precise Finishing Systems, Inc. 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 Permit to Install (PTI) number 47-17; Condition VI 1 & 2. As well as Rule R336.1287(2)(c) record keeping for a paint booth.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|-------------------------|---|--|
| Electropolish Dip Tanks | Condition VI. 1 & 2. Record Keeping | Facility had no monthly records of chemical usage. |
| Paint booth | R336.1287(2) (c) (iii) records for paint booth. | Facility has no monthly records for paint booth usage. |
| EU-ElectPol | Condition II. 1 & 2. Material Limits | Facility shows purchase records of more gallons than allowable under PTI 47-17 |

This process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Source Standards for Plating and Polishing Operations. These standards are found in 40 CFR Part 63, Subpart A and WWWWWW.

During this inspection, Precise Finishing Systems Inc., was unable to produce usage or emission records.

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This is a violation of the recordkeeping and emission limitations specified in Special Condition VI 1 & 2 of PTI number 47-17. This is also a violation of Special Condition II 1 & 2 of PTI 47-17, as well as a violation for Rule 287(2) record keeping for paint use in the facility paint booth.

The conditions of PTI number 47-17 require the permittee to keep in a satisfactory manner, records of gallons of electropolish containing phosphoric acid and sulfuric acid used each month and a 12-month rolling time period. The permittee shall keep a record of the gallons of cleaning product containing 2-butoxyethanol each month, and 12-month rolling time period. (e.g., maintenance of records, which shall be made available for review upon request by the AQD staff). The PTI conditions also state a usage limit of 700 gallons of electropolish with phosphoric/sulfuric acids and 60 gallons of 2-butoxyethanol cleaning products. Based on purchase records provided to the AQD the facility exceeded the usage limits stated in PTI 47-17. Rule 287 (2)(c)(iii) states the facility must maintain usage records for paint, subpart (c)(iii) is used to ensure the 200-gallon limit is maintained.

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

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 1, 2023, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Provide updated records since the violation was discussed with the facility.

Please submit the written response to EGLE, AQD, Lansing District, at 525 W. Allegan St., Lansing, Michigan 48933 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Precise Finishing Systems Inc. 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 violation cited above and for the cooperation that was extended to me during my inspection of Precise Finishing Systems Inc.

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If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in cursive script that reads "David Rauch".

David Rauch
Environmental Quality Analyst
Air Quality Division
517-216-0423

Enclosure

cc:

Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Bob Byrnes, EGLE



MICHIGAN DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY

RULE 287(2)(c) PERMIT TO INSTALL EXEMPTION RECORD: SURFACE COATING EQUIPMENT

Applicable Rule: Rule 287(2)(c) of the Michigan Air Pollution Control Rules

NOTE: 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:

This record is provided as a courtesy for businesses by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Clean Air Assistance Program, and is not required to be returned or submitted to EGLE unless specifically requested.

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.)

INSTRUCTIONS FOR USING THIS RECORD-KEEPING FORM

COMPLETE THE MONTHLY COATING USAGE LOG FOR EACH SURFACE COATING LINE USING THE EXEMPTION IN RULE 287(2)(c).

Columns (a) and (b): Identify the name of the coating manufacturer and the product identification number. This information can be obtained from the coating container or the MSDS.

Column (c): List the coating type. This may include but not be limited to the following: precoat, primer/primer surfacer, primer sealer, topcoat, thinners, and reducers.

Column (d): Record the volume of coating used, as applied, minus water, in gallons. At the end of the month, total the quantities in column (d). This total should not exceed 200 gallons. [To find the volume as applied, minus water, multiply the amount used by 1 minus the volume fraction of water in the coating. For example, if you use 5 gallons of a coating that is 40% water by volume, multiply 5 by (1-0.40). This calculation yields a coating usage of 3 gallons, as applied, minus water.]

Column (e): Initials of operator or owner.

Column (f): Record the volume of cleanup solvents used in gallons. Even though Rule 287(2)(c) does not address cleanup solvent usage, it is advisable to keep track of this usage. Facilities that receive Michigan Air Pollution Reporting Forms should include their usage of cleanup solvent on the forms.

RULE 287(2)(c) PERMIT TO INSTALL EXEMPTION RECORD: SURFACE COATING EQUIPMENT

Applicable Rule: Rule 287(2)(c) of the Michigan Air Pollution Control Rules

SOURCE NAME: _____

MONTH/YEAR: January 2017

| Manufacturer (a) | Product ID Number (b) | Coating Type (c) | Coating Usage (gal) (d) | Operator's Initials (e) | Cleanup Solvent Usage (gal) (f) |
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| | | | 0.00 Total coating used (gal) (<200 gal/month) | | 0.00 Total cleanup solvent used (gal) |