



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 11, 2019

Mr. Tyler Lang, General Manager
Jackson Metal Cleaning
3507 Wayland Drive
Jackson, Michigan 49202

SRN: P0915, Ingham County

Dear Mr. Lang:

VIOLATION NOTICE

On January 22, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Jackson Metal Cleaning located at 1492 W. Grand River Avenue, Building #2, Williamston, Michigan. The purpose of this inspection was to determine Jackson Metal Cleaning'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; and the conditions of Permit to Install (PTI) number 70-18.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-BURNOFF	SC III.2	Waste paint ash (post-burn-off) is "reburned" within EU-BURNOFF.
EU-BURNOFF	SC IV.4 and SC VI.3	Continuous temperature data records were not kept.

During the inspection, AQD staff observed bins of ash that had been removed from EU-BURNOFF oven, in addition to the ash removed from process wastewater. Jackson Metal Cleaning staff said the waste ash from these two waste streams is placed in EU-BURNOFF to reburn the ash to ensure there are no longer hazardous materials contained within the ash itself.

This is a violation of the Process/Operational Restrictions specified in Special Condition III.2 of PTI number 70-18. This condition requires that the permittee shall not load any waste materials into EU-BURNOFF.

Although requested by the AQD, Jackson Metal Cleaning was unable to produce continuous afterburner temperature records.

Mr. Tyler Lang
Page 2
February 11, 2019

This is a violation of the Design/Equipment Parameters and Monitoring/Recordkeeping requirements specified in Special Conditions IV.4 and VI.3 of PTI number 70-18.

The conditions of PTI number 70-18 require that afterburner temperatures be recorded at least once every 15 minutes, and these records are required to be kept and made available to the AQD upon request.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 4, 2019 (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, (including what will be done with the waste ash), 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 the DEQ, AQD, Lansing District, at Constitution Hall, First Floor South, 525 W. Allegan, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

Sincerely,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-284-6636

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Brad Myott, DEQ