



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

December 7, 2018

Mr. Kevin Estes
Chief Operating Officer
Central Conveyor
52800 Pontiac Trail
Wixom, MI 48393-1928

SRN: P0982, Oakland County

Dear Mr. Estes:

VIOLATION NOTICE

On December 2, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Central Conveyor (Central) located at 52800 Pontiac Trail, Wixom, Michigan. The purpose of this inspection was to determine Central'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

During the December 5, 2018, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Structural parts paint spray booth (40 feet W x 14 feet D x 12 feet H) Spray Booth Products, Inc.	Rule 336.1201 ^β (Permit-to-Install)	Central Conveyor (Central), around April 2016, installed the paint spray booth without obtaining a Permit-to-Install.
Structural parts paint spray booth (40 feet W x 14 feet D x 12 feet H)	Rule 336.1910	Back-draft dry filter system for paint overspray capture was inadequate. The filters were not installed properly; there were numerous holes and gaps.
^β The booth is not exempt from Rule 336.1201 (Permit-to-Install) as solvent based paint usage is about or greater than 200 gallons per month at current production levels. As discussed on December 4, 2018, with Messrs. Matt Warstler and Bruce Mazurowski, Central will obtain a NESHAP/MACT (40 CFR Part 63, Subpart M—National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products) synthetic minor permit with requisite limits for hazardous air pollutants (HAPs). It may be noted that if Central fails to obtain a valid and proper Synthetic Minor Permit, AQD may issue additional violations and pursue enforcement actions for failing to comply with NESHAP/MACT 4M and to obtain federal Title V operating permit (known as Michigan Renewable Operating Permit) according to Rule 336.1210.		

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During this inspection it was noted that Central, around April 2016, had installed and commenced operation of unpermitted structural parts paint spray booth at this facility. The AQD staff advised Central on December 4 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 structural parts paint booth process equipment. An application form is available by request or at the following website: www.michigan.gov/deqair (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.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at <http://www.michigan.gov/deqair>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading.

On December 4, 2018, the AQD staff observed operation of structural parts paint spray booth while back-draft dry filter system for paint overspray capture was inadequate as the filter panels were installed improperly with gaps and holes. As discussed, gaps and holes may be covered with duct/painters' tapes to prevent paint particulate laden air from bypassing filter media as air flows through a path of least resistance.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 28, 2018 (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 the DEQ, AQD, Southeast Michigan District, at 27700 Donald Ct., Warren, Michigan 48092-2793 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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If Central 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 Central. 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,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-753-3741 or Konanahalli@michigan.gov

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Jeff Rathbun, DEQ
Ms. Joyce Zhu, DEQ
Mr. David Thompson, DEQ