



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

May 15, 2017

Mr. Nathan Schwartz, Manager
Line-X
1435 East Hill Road
Grand Blanc, Michigan 48439

SRN: U251701557, Genesee County

Dear Mr. Schwartz:

VIOLATION NOTICE

On March 21, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted a complaint investigation of Line-X located at 1435 East Hill Road, Grand Blanc. The purpose of this inspection was to determine Line-X'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 to investigate a recent complaint which we received on March 16, 2017, regarding foul odors attributed to Line-X's operations.

During the investigation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Spray coating process	201	Process installed and operated without having first obtained a permit to install.
Spray coating process	Rule 910	Exhaust system operating without particulate filter.

During the investigation on March 21, 2017, I was informed that Line-X has installed and operated a spray coating process. I advised Line-X at that time that surface coating operation is required to obtain a permit to install under Michigan Air Pollution Control Rule 201, or to demonstrate that they qualify for an exemption from the requirement to obtain a permit to install.

I provided Line-X with a copy of *The Permit to Install Exemption Handbook*, which includes Rule 287(2)(c). This rule exempts the following from the requirement to obtain a permit to install:

- (c) A surface coating line if all of the following conditions are met:
 - (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
 - (ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.
 - (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

During the investigation, Line-X was unable to produce emission records for the most recent 2-year period. Additionally, the exhaust system I observed did not have a particulate filter to control particulate emissions. At that time, the spray coating process did not satisfy the Rule 287(2)(c) exemption from the requirement of Rule 201 to obtain a permit to install. Therefore, Line-X has installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Line-X on May 12, 2017, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the spray coating process. 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). Alternately, Line-X may provide a written exemption demonstration as part of a response, to document that it is able to satisfy the exemption criteria for Rule 287(c).

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.

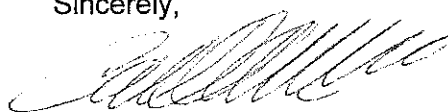
Also on March 21, 2017, the AQD staff observed operation of the spray coating process while the exhaust system was operating without a particulate filter in place. This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated 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 June 5, 2017. 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 Line-X 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 investigation of Line-X. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-284-6638

DAM:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ