



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

November 1, 2018

Mr. Travis Ridenour
TLR Coatings
6275 South 26th Street
Scotts, Michigan 49088

SRN: U391809600, Kalamazoo County

Dear Mr. Ridenour:

VIOLATION NOTICE

On October 22, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of TLR Coatings (Facility), located at 6275 South 26th Street, Scotts, Michigan. The purpose of this inspection was to determine the Facility'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); and the Air Pollution Control Rules.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Acid dripping process	R 336.1285(2)(r)(iii) and R 336.1201 (Rule 201)	The acid dipping operation was outside, and, therefore, cannot be considered exempt under Rule 285. Because the Facility could not meet the exemption, this process requires a permit and is also in violation of Rule 201. The process needs to be moved indoors, or a Permit to Install should be obtained from the AQD.

During this inspection, it was noted that the Facility had installed and commenced operation of unpermitted equipment at this Facility. The AQD staff advised the Facility on October 22, 2018, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451. The process needs to be moved indoors or will otherwise require a permit from the AQD.

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A program for compliance may include a completed Permit to Install application for the acid dripping 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.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 22, 2018 (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.

Please submit the written response to the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

Sincerely,



Monica Brothers
Environmental Quality Analyst
Air Quality Division
269-567-3552

MB:CF

Enclosure

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Mary Douglas, DEQ