



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

October 5, 2016

Mr. Dan Welch, Owner
Industrial Finishing Company
3620 Millcreek
Comstock Park, Michigan 49321

SRN: A2481, Kent County

Dear Mr. Welch:

VIOLATION NOTICE

On September 22, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Industrial Finishing Company located at 3620 Millcreek, Comstock Park, Michigan. The purpose of this inspection was to determine Industrial Finishing Company'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; the conditions of General Permit No. 61-09; and to investigate a recent complaint which was received on September 21, 2016, regarding fallout attributed to Industrial Finishing Company's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-COATING	General Permit No. 61-09 Special Condition IV.2	Failure to maintain and operate a particulate control device.
FG-COATING	General Permit No. 61-09 Special Condition VI.3.d	Failure to maintain monthly VOC emission calculations for each coating line.
FG-COATING	General Permit No. 61-09 Special Condition VI.3.e	Failure to maintain 12-month rolling VOC emission calculations for each line.
FG-SOURCE	General Permit No. 61-09 Special Condition VI.1	Failure to maintain source-wide 12-month rolling VOC emission calculations.
FG-COATING	Rule 901(a)	Injurious effects to property.

During this inspection, Industrial Finishing Company was unable to produce monthly and 12-month rolling VOC emission records for each of their coating lines and 12-month rolling VOC emission records for the stationary source. This is a violation of the recordkeeping requirements specified in General Permit No. 61-09, FG-COATING, Special Conditions VI.3.d and e; and FG-SOURCE, Special Condition VI.1. The conditions of General Permit No. 61-09 require emission calculations be made available for review upon request by the AQD staff.

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On September 22, 2016, the AQD staff observed operation of one of the spray booths without proper particulate control resulting in fallout. This is a violation of General Permit No. 61-09, FG-COATING, Special Condition IV.2, which requires the permittee to only operate the spray application process with particulate control (dry filter) installed, maintained and operated in a satisfactory manner.

Additionally, In the professional judgment of AQD staff, the fallout that was observed on the property adjacent to Industrial Finishing Company of sufficient intensity so as to constitute a violation of Rule 901. The improper operation of the particulate control for the spray booth resulted in the damaging fallout.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 26, 2016 (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.

If Industrial Finishing Company 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 Industrial Finishing Company. 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,



Kaitlyn J. DeVries
Environmental Quality Analyst
Air Quality Division
616-356-0003

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ