



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 3, 2020

Mr. Jeff Jones
Owner and President
Conformance Coating and Prototype, Inc.
2321 Busha Highway
Marysville, MI48040

SRN: N0871, Saint Clair County

Dear Mr. Jones:

VIOLATION NOTICE

On January 16, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Conformance Coatings and Prototype, Inc. (CCP), located at 2321 Busha Highway, Marysville, Michigan. The purpose of this inspection was to determine Conformance Coatings and Prototype, Inc.'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 75-04.

During the record review, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---|---|--|
| Plastic parts coating line consisting of a dry filter paint spray booth, an infrared light, and a lab oven/batch oven/in-line oven. FGPPCOATING | PTI No. 75-04 FGPPCOATING SC 1.1 a, 1.1b, 1.1c and 1.1d and 1.11. | See table 1 below: actual emissions and Emission limit for FGPPCOATING |
| FGFACILITY | PTI No. 75-04 FGFACILITY SC 2.1 a, SC 2.1b and 2.4 | See table 2 below: Actual emissions and emission limit for FGFACILITY |

EMISSIONS REPORTED OR OBSERVED

Table 1: Actual emissions and emission Limit for FGPPCOATING

| SC | Pollutant | Equipment | Emissions record from January through December 2019 | Limit | Time Period | Rule/Permit Condition Violated | Compliance |
|------|-----------|--|---|--|-----------------------|---|----------------|
| 1.1a | VOCs | FGPPCOATING | The records shows that actual emissions of VOC from the FGPPCOATING process equipment are 10,808 tpy at the end of December 2019. | 30.0 tpy | 12-month rolling time | PTI No. 75-04 FGPPCOATING SC 1.1a | Non-compliance |
| 1.1b | VOCs | Each Individual Emission Unit Portion of FGPPCOATING when coating of plastic business machine parts. | The permittee did not keep the record in terms of VOC lb/(gallon of solids applied) as required by the permit . | 11.96 pounds per gallon of solids applied* | Calendar month | PTI No. 75-04 FGPPCOATING SC 1.1b and 1.11. | Non-compliance |
| 1.1c | VOCs | Each Individual Emission Unit Portion of FGPPCOATING. | The permittee did not keep the record to demonstrate compliance as required by the permit . | 2000 pounds | Calendar month | PTI No. 75-04 FGPPCOATING SC 1.1c and 1.11. | Non-Compliance |
| 1.1d | VOCs | Each Individual Emission Unit Portion of FGPPCOATING. | The permittee did not keep the record to demonstrate compliance as required by the permit. | 10.0 tpy | 12-month rolling | PTI No. 75-04 FGPPCOATING SC 1.1d and 1.11. | Non-Compliance |

Table 2: Actual emissions and emission Limit for FGFACILITY

| SC | Pollutant | Equipment | Emissions record from January through December 2019 | Limit | Rule/Permit Condition Violated | Compliance |
|------|---------------------|------------|---|------------------------------|----------------------------------|------------|
| 2.1a | EACH INDIVIDUAL HAP | FGFACILITY | Greater than 9 tons | Less than 9.0 tons per year | PTI No. 75-04 FGFACILITY SC 2.1a | No |
| 2.1b | Aggregate HAPs | FGFACILITY | 916 tons | Less than 22.5 tons per year | PTI No. 75-04 FGFACILITY SC 2.1b | No |

The records provided demonstrate that actual emissions of VOC and HAP(s) from the FGPPCOATING & FGFACILITY respectively exceeded the PSD/Major Offset threshold as well as the Title V major source threshold per year.

Based on the emissions you reported above, it appears that your facility becomes a major source due to the significant emissions of VOC as well as HAP(s). Under state Air Pollution Law and the federal Clean Air Act, a Renewable Operating Permit (ROP) Program has been developed and implemented in Michigan. This program requires major sources of air emissions to obtain a facility-wide air use permit. This permit serves as a mechanism for consolidating and clarifying all air pollution control requirements which apply to the source. Rule 210(5) of Part 55, Air Pollution control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) requires major sources to submit an application to the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD) not more than 12 months after a stationary source commences operation as a major source, as defined by Rule 211(1)(a) of Act 451.

As a result of the failure to submit a timely and administratively complete application, in accordance with the requirements of Rule 210(5), this facility has failed to obtain an "application shield". Operation of the process or process equipment without the benefit of the application shield constitutes a violation of Rule 210(1) that may result in enforcement action under the provisions of Act 451. Notwithstanding the response to this letter, be advised that the AQD may initiate appropriate enforcement action to address this violation and the action for your unpermitted installation and operation of this process equipment. Furthermore, continued operation of unpermitted equipment is not authorized.

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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.

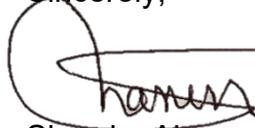
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 24, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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 recurrence.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Shamim Ahammod", written over a circular stamp or mark.

Shamim Ahammod
Environmental Engineer
Air Quality Division
586-212-0508

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE