



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 12, 2019

Mr. Mike Lentz
General Manager
Michigan Metal Coatings
2015 Dove Street
Port Huron, MI 48060

SRN: N0950, St.Clair County

Dear Mr. Lentz:

VIOLATION NOTICE

On August 22, 2019, the Michigan Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD), received a notification via email from Michigan Metal Coatings located at 2015 Dove Street, Port Huron, Michigan. The purpose of this notification was to inform AQD about a fire that broke out inside the ductwork that leads to the Regenerative Thermal Oxidizers (RTO) on top of the roof at approximately 6 p.m. on August 21, 2019. Mr. Rich Rumor, Quality Assurance Manager, Michigan Metal Coatings, also notified AQD via phone.

Per Mr. Rumor's email, "MMC resumed production at midnight on August 22, 2019, to run production on all coating lines in order to meet customer delivery demands. At 2:15 p.m. the same day, the ductwork has been repaired and have returned to normal operations with all applicable coating lines running through the RTO."

Based on the above information and phone call conversation with Mr. Rumor, staff identified the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOATER1, EUCOATER1A, EUCOATER2, and EUCOATER5	R 336.1910 Air-cleaning devices. PTI NO. 116-06B, FGCOATER, SC IV.1.	RTO was not in operation while the facility's coating processes were in operation from 12 a.m. through 2:14 p.m. (August 22, 2019). This constitutes a violation of SC IV.1 of FGCOATER (PTI No. 116-06B), and Rule 910.

Per SC IV.1 of FGCOATER (PTI NO. 116-06B), "The permittee shall not operate EUCOATER1, EUCOATER1A, EUCOATER2, and EUCOATER5 unless the RTO is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes a minimum VOC destruction efficiency of 95 percent (by weight), maintaining a minimum temperature of 1,500°F or the adjusted minimum temperature based on the most recent acceptable stack test which achieved a minimum overall

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destruction efficiency of 95%, and a minimum retention time of 0.5 seconds." Permittee operated EUCOATER1, EUCOATER1A, EUCOATER2, and EUCOATER5 when RTO was in idle operational mode from 12 a.m. through 2:14 p.m. (August 22, 2019). This constitutes a violation of SC IV.1 of FGCOATER (PTI NO. 116-06B) and 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.

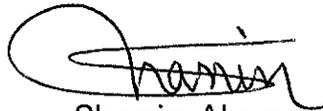
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 3, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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 EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Michigan Metal Coatings 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 Michigan Metal Coatings. 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,



Shamim Ahammod
Environmental Engineer
586-212-0508|Ahammod@michigan.gov

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