



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 16, 2021

Mr. Dennis Kowalczyk
PRS Manufacturing Inc.
3745 Dykstra Drive
Walker, Michigan 49504

SRN: N1229, Kent County

Dear Mr. Kowalczyk:

VIOLATION NOTICE

On November 4, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of PRS Manufacturing Inc. located at 3745 Dykstra Drive, Walker, Michigan. The purpose of this inspection was to determine PRS Manufacturing 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 915-85B and General Permit to Install (PTI) number 127-18.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-STRIPOVEN	PTI No. 915-85B, EU-STRIPOVEN, Special Condition (SC) VI.2, VI.4, and VI.5.	Failure to maintain specified records.
FG-COATING	General PTI No. 127-18, FG-Coating, SC V.1, VI.3(a-e), and VI.4.	Failure to test VOC content of material and failure to maintain specified records.
FG-SOURCE	General PTI No. 127-18, FG-SOURCE, SC VI.1.	Failure to maintain specified records.

During this inspection, PRS Manufacturing Inc. was unable to produce emissions records. This is a violation of the recordkeeping requirements specified in EU-STRIPOVEN, SC VI.2, VI.4, and VI.5. of PTI No. 915-85B. This is also a violation of the recordkeeping conditions specified in FG-COATING, SC V.1, VI.3(a-e), and VI.4, and FG-SOURCE, SC VI.1. of General PTI No. 127-18.

The conditions of PTI No. 915-85B require temperature records of the secondary chamber/afterburner in the burn-off oven, listing of manufacturer chemical composition of each material processed in EU-STRIPOVEN, and records of batches processed in EU-STRIPOVEN, which shall be made available for review upon request by the AQD staff.

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The conditions of General PTI No. 127-18 require testing records of the VOC content utilizing Method 24, purchase orders or invoices of coatings, reducers, and purge/clean-up solvents; VOC content in pounds per gallon of coating, reducer, and purge/clean-up solvent; gallons of coatings, reducers, and purge/clean-up solvents used; VOC mass emission calculations per month and VOC mass emission calculations per 12-month rolling time period for FG-COATING; and VOC mass emission calculations per 12-month rolling time period for FG-SOURCE, which shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 6, 2022 (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.

Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If PRS Manufacturing Inc. 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 PRS Manufacturing Inc. 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,



Michael Cox
Environmental Quality Analyst
Air Quality Division
616-240-3607

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