



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

April 22, 2024

VIA EMAIL ONLY

John Zanti, Senior Plant Manager
Mint Group LTD
935 Aulerich Road
East Tawas, Michigan 48730

SRN: N3592, Iosco County

Dear John Zanti:

VIOLATION NOTICE

On April 11, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed smoke tube testing of EUCOATING at Mint Group LTD located at 935 Aulerich Road, East Tawas, Michigan. As part of the smoke test observation, a site walk through was completed. The purpose of the test observation and associated site walk through was to determine Mint Group LTD'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 119-20.

During the observation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOATING	PTI No. 119-20 Special Condition (SC) III.4	Positive pressure was observed at the top right corner of the cool down tunnel following the cure oven exit.
EUCOATING	Rule 336.1201 (Rule 201)	Information provided in the PTI application regarding the air stream pathway and emissions control of EUCOATING does not accurately reflect actual operation.

EUCOATING SC III.4. of PTI No. 119-20 states the permittee shall maintain a negative pressure differential between the non-fugitive enclosure and the adjacent area through each natural draft opening (NDO). An NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. To demonstrate a negative pressure differential, SC V.2. states the permittee shall semi-annually verify that the

direction of air flow at each natural draft opening (NDO) is into the non-fugitive enclosure, using a smoke test (i.e., smoke bomb, smoke tube). AQD staff observed the smoke tube test completed on April 11, 2024. NDOs identified in which smoke tube testing was completed include the pre-wash entrance and the cure oven exit. The direction of airflow was verified at all four corners and the center of each NDO. A cool down tunnel extension had been added to the cure oven exit. Smoke tube testing for the cure oven exit was conducted at the opening of the new cool down tunnel. During the smoke tube test, air flow was observed flowing away from the enclosure in the top right corner of the cure oven exit. Smoke flowing away from the enclosure indicates a positive pressure and is a violation of SC III.4.

In conjunction with the smoke tube test observation, AQD staff conducted a site walk through. A stack vent was located directly out the original cure oven exit and within the new cool down tunnel. This stack was previously reported to be capped. At the time of smoke tube testing, the stack was observed to be uncapped with a damper installed. The damper was observed to be in an open position allowing air flow out the stack.

During the site walk through, a duct was observed exiting the E-Cube room associated with the primer booth and out the roof of the facility. An elbow was observed on the stack with a duct that goes to the regenerative thermal oxidizer (RTO). Dampers were observed to be in place allowing staff to manually direct air flow out the stack, or to the RTO. At the time of smoke tube testing, the dampers were observed to be in a position directing air flow out the stack, bypassing the RTO.

Current site operations do not appear to be reflective of how the process was evaluated at the time of permitting. The Permit to Install evaluation was done based off information provided in the permit application, with the assumption that the coating line operates with a 100% capture efficiency in which the air stream is sent to a RTO for VOC emission control. The additional stacks present, venting to atmosphere, means 100% capture efficiency is not being achieved. Inaccurate / missing required information from a PTI application is a violation of Rule 336.1201, also known as Rule 201.

Rule 201 outlines the Permit to Install requirements. Rule 201(b) states a person who plans to install, construct, reconstruct, relocate, or modify any such process or process equipment shall apply to the department for a Permit to Install on an application form approved by the department and shall provide the information required in R 336.1203, also known as Rule 203. Rule 203 lists what information that must be included in a PTI application. Rule 203(a) states the application shall provide the capture and removal efficiency of any air pollution control devices. Additionally, Rule 203(e) states the application shall include a description of each stack or vent related to the proposed process equipment, including the minimum anticipated height above ground, maximum anticipated internal dimensions, discharge orientation, exhaust volume flow rate, exhaust gas temperature, and rain protection device, if any.

John Zanti
Mint Group LTD
Page 3
April 22, 2024

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 13, 2024 (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 Nathanael Gentle at EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or GentleN@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Mint Group LTD 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. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Nathanael Gentle
Environmental Quality Analyst
Air Quality Division
989-778-0025
GentleN@Michigan.gov

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Gina McCann, EGLE