



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



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

January 10, 2020

Mrs. Gloria Ender  
 Freedom Finishing, Inc.  
 2755 Meadowbrook Road  
 Benton Harbor, MI 49022

SRN: N3694, Berrien County

Dear Mrs. Ender:

**VIOLATION NOTICE**

On December 12, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Freedom Finishing, Inc. located at 2755 Meadowbrook Road, Benton Harbor, Michigan. The purpose of this inspection was to determine Freedom Finishing'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 195-12 and 211-01.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-COATLINE	R.336.1702(a) / Special Condition (SC) 1.1, 1.2, and 1.6 of PTI #211-01	Per SC 1.6: The facility is not tracking gallons per month of every solvent used, 12-month rolling time, VOC in tons per month, or maintaining accessible records. Compliance with SC 1.1 and 1.2 monthly and 12-month rolling VOC emission rates could not be determined.
EU-BURNOFF2	R.336.201(3) / SC VI	The facility could not confirm records are kept on site for five years.
EU-BURNOFF2	Rule 336.910 / SC IV.1, SC VI.1 and SC VI.3	The facility was unable to confirm the burn off oven has a device to continuously monitor the temperature in the secondary chamber or afterburner and record the temperature at least once every 15 minutes and, therefore, could not submit records to demonstrate they are tracking temperature data or complying with SC IV.1.

During this inspection, Freedom Finishing, Inc. was unable to produce emission records.

This is a violation of the recordkeeping and emission limitations specified in Special Condition SC 1.1, 1.2, and 1.6 of PTI number 211-01 and SC IV.1, VI.1, and VI.3 of PTI number 195-12.

The conditions listed above from PTI number 211-01 require records to be kept on file for a period of five years which shall be made available for review upon request by the AQD staff and for the facility to track gallons (with water) of each solvent used on a monthly basis. PTI 211-01

Mrs. Gloria Ender  
Freedom Finishing, Inc.  
Page 2  
January 10, 2020

also requires the facility to track VOC mass emissions calculations in tons per month and in tons per 12-month rolling time period so that compliance with emission limits may be assessed.

The conditions listed above from PTI number 195-12 require the burn off secondary chamber or afterburner to maintain a minimum temperature of 1400 degrees (F) for a minimum retention time of 0.5 seconds. The permit requires the facility to maintain temperature data records from the continuous temperature monitor of the secondary chamber or afterburner so that compliance with this condition may be assessed.

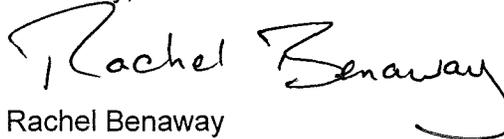
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 31, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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, Kalamazoo District, at 7953 Adobe Rd., Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Freedom Finishing, 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 Freedom Finishing, 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,



Rachel Benaway  
Environmental Quality Analyst  
Air Quality Division  
269-370-2170

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