



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 29, 2019

Mr. Tim Braniff
Spectrum Decorative Finishes, Inc.
13 McConnell Street SW
Grand Rapids, Michigan 49503

SRN: N6218, Kent County

Dear Mr. Braniff:

SECOND VIOLATION NOTICE

On March 25, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted a review of the Air Emission Test Report received from Spectrum Decorative Finishes, Inc., located at 13 McConnell Street SW, Grand Rapids, Michigan. The purpose of the report review was to determine Spectrum Decorative Finishes, 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; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 277-97C.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUMAINLINE	PTI No. 277-97C, EUMAINLINE, Special Condition IV.3; Rule 910	Failure to meet a minimum destruction efficiency of 95% (by weight). Failure to properly install, maintain and operate an air-cleaning device.

On June 26, 2018, the AQD sent Spectrum Decorative Finishes, Inc. a Violation Notice citing a violation of PTI No. 277-97C and Rule 910 in response to review of a report of the condition of the regenerative thermal oxidizer (RTO), and the fact that the company cancelled stack testing because they believed the unit would not meet the permit requirements. A response to this Violation Notice was due by July 17, 2018. A copy of that letter is enclosed for your reference.

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The July 18, 2018 response to the Violation Notice requested additional time to determine a course of action and bi-weekly progress reports. On August 23, 2018 Spectrum Decorative Finishes committed to shutting down EUMAINLINE by December 31, 2018, because it was too costly to fix the RTO.

On December 12, 2018, the AQD learned that Spectrum Decorative Finishes, Inc. would not be shutting the line down as planned, and scheduled stack testing for January 23, 2019. In the meantime, no significant repairs to the RTO had been made.

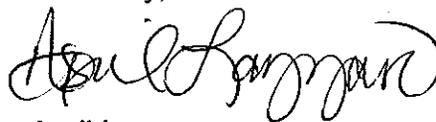
The results of the stack test have been received and reviewed, and it has been determined that the RTO destruction efficiency is 86% which indicates continued non-compliance with the permit limit of 95% destruction efficiency.

Please submit a written response by April 19, 2019 to the DEQ, 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 the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violation or the action necessary to bring Spectrum Decorative Finishes, Inc. into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
616-558-1092

Enclosure

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