



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

July 29, 2022

VIA E-MAIL AND U.S. MAIL

Marvin Hairston  
Spraytek Inc.  
2535 Wolcott Street  
Ferndale, MI 48220

SRN: N0917, Oakland County

Dear Marvin Hairston:

**VIOLATION NOTICE**

On July 22, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Spraytek Inc. located at 2535 Wolcott Street, Ferndale, Michigan. The purpose of this inspection was to determine SprayTek'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 143-04D.

During the inspection, staff observed the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
EUBATCH2 and EUWASHLINE Booth #1	PTI No. 143-04D, FGRULE621, IV.1	The permittee failed to install the exhaust filters in a satisfactory manner, which resulted in gaps that allow particulate material to bypass the control device.
EUBATCH2 and EUWASHLINE Booth #1	R 336.1910	The permittee failed to install the exhaust filters in a satisfactory manner, which resulted in gaps that allow particulate material to bypass the control device.
FGRULE621	PTI No. 143-04D, FGRULE621, III.3	The permittee failed to handle a one-gallon can of acetone in a manner to minimize the generation of fugitive emissions by leaving the can uncovered when the operator was absent.

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On July 22, 2022, the AQD staff observed gaps in the placement of dry particulate filters in EUBATCH2 and EUWASHLINE Booth #1. This constitutes a violation of PTI No. 143-04D, FGRULE621, IV.1, which states, *“The permittee shall not operate the spray booth portions of FGRULE621 unless the respective exhaust filters are installed, maintained and operated in a satisfactory manner.”*

On July 22, 2022, the AQD staff observed gaps in the placement of dry particulate filters in EUBATCH2, and EUWASHLINE Booth #1. This constitutes a violation of R 336.1910 (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.

On July 22, 2022, the AQD staff observed the permittee failed to handle a one-gallon can of acetone in a manner to minimize the generation of fugitive emissions by leaving the can uncovered when the operator was absent. This constitutes a violation of PTI No. 143-04D, FGRULE621, III.3, which states, *“The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions, implementing the procedures for minimizing emissions as described in Appendix A. The permittee shall keep containers covered at all times except when operator access is necessary.”*

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 19, 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, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Spraytek 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 Spraytek 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 or email listed below.

Marvin Hairston  
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Sincerely,

A handwritten signature in black ink that reads "Robert Elmouchi". The signature is written in a cursive style with a large, stylized initial 'R'.

Robert Elmouchi  
Senior Environmental Quality Analyst  
Air Quality Division  
586-854-3244; [elmouchir@michigan.gov](mailto:elmouchir@michigan.gov)

cc: Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Dr. Eduardo Olaguer, EGLE  
Jenine Camilleri, EGLE  
Christopher Ethridge, EGLE  
Joyce Zhu, EGLE  
Susan Apczynski, Spraytek