



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

May 31, 2016

Mr. Terry Byers
TIDI CFI Products, LLC
14241 Fenton Road
Fenton, Michigan 48430-1541

SRN: N1912, Genesee County

Dear Mr. Byers:

VIOLATION NOTICE

On May 24, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of TIDI CFI Products, LLC, located at 14241 Fenton Road, Fenton, Michigan. The purpose of this inspection was to determine 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 administrative rules and the conditions of Permit to Install (PTI) numbers 34-00A and 35-15.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-COATING - Coating booths and ovens associated with the foam parts coating process.	PTI 34-00A, Special Condition (SC) III.4. On and after February 28, 2009, the permittee shall not operate the plastic foam parts coating process unless at least two of the eight paint spray booths are operating simultaneously. The permittee shall keep records, in a format acceptable to the District Supervisor, of the hours of operation of each paint booth including the date and time that each paint booth was operated. These records shall be maintained on file at the facility for a period of five years and will be made available to the Department upon request. (R 336.1702(a))	Records of the number of booths operating including the date and time that each paint booth was operated were not being kept.
FG-COATING - Coating booths and ovens associated with the foam parts coating process.	PTI 34-00A, SC VI.3. The permittee shall keep the following information on a monthly basis for each spray booth within FG-COATING and for all coating booths combined in FG-COATING: a) Gallons of each material (coating, reducer/thinner, cleanup solvent, etc.) used.	Records of VOC and Acetone mass emission calculations determining the monthly and the annual emission rate in tons per 12-month rolling time period were not being kept.

Process Description	Rule/Permit Condition Violated	Comments
	<p>b) VOC content of each material (coating, reducer/thinner, cleanup solvent, etc.).</p> <p>c) Acetone content of each material (coating, reducer/thinner, cleanup solvent, etc.).</p> <p>d) VOC and Acetone combined mass emission calculations determining the monthly emission rate in tons per calendar month for each spray booth and combined for all spray booths within FG-COATING.</p> <p>e) VOC and Acetone combined mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for each spray booth and combined for all spray booths within FG-COATING.</p> <p>The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225, R 336.1702(a), R 336.1901)</p>	
<p>FG-COATING - Coating booths and ovens associated with the foam parts coating process.</p>	<p>PTI 34-00A, SC VI.4. The permittee shall keep the following information on a daily basis for FG-COATING:</p> <p>a) Gallons (with water) of each Xylene containing material used.</p> <p>b) Gallons (with water) of each Isopropyl Alcohol containing material used.</p> <p>c) If applicable, gallons (with water) of each Xylene containing material reclaimed.</p> <p>d) If applicable, gallons (with water) of each Isopropyl Alcohol containing material reclaimed.</p> <p>e) The Xylene content (with water) in pounds per gallon of each material used.</p> <p>f) The Isopropyl Alcohol content (with water) in pounds per gallon of each material used.</p> <p>g) Xylene mass emission calculations determining the daily emission rate in pounds per calendar day.</p> <p>h) Isopropyl Alcohol mass emission calculations determining the daily emission rate in pounds per calendar day.</p> <p>The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1225)</p>	<p>Records of xylene and isopropyl alcohol mass emission calculations determining the daily emission rate in pounds per calendar day were not being kept.</p>

Process Description	Rule/Permit Condition Violated	Comments
<p>FG-FACILITY - All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.</p>	<p>PTI 34-00A, SC VI.2. The permittee shall keep the following information on a monthly basis for FG-FACILITY:</p> <ul style="list-style-type: none"> a) Gallons or pounds of each hazardous air pollutant (HAP) containing material used. b) Where applicable, gallons or pounds of each HAP containing material reclaimed. c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used. d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month. e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month. <p>The permittee shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. (R 336.1205(3))</p>	<p>Records of individual and aggregate HAP mass emission calculations determining the monthly and the annual emission rate in tons per 12-month rolling time period were not being kept.</p>
<p>EU-BULBCRUSHER - One 55-gallon drum-top fluorescent light bulb crusher (DTC), controlled by a bag filter followed in series by a HEPA filter and an activated carbon filter.</p>	<p>PTI 35-15, SC III.1. EU-BULBCRUSHER shall be installed, maintained, and operated in a satisfactory manner to minimize emissions to the ambient air. Recommended Best Management Practices for Drum-top Crushers and Recommended Best Management Practices for Lamp Handling & Storage are specified in Appendices 1 and 2. (R 336.1224, R 336.1910)</p>	<p>The DTC had white powder on top of the unit. There was no evidence that an operator training program, standard operating procedures, and maintenance program had been developed for the DTC as recommended in Appendices 1 and 2. The DTC was not being operated in a satisfactory manner.</p>
<p>EU-BULBCRUSHER - One 55-gallon drum-top fluorescent light bulb crusher, controlled by a bag filter followed in series by a HEPA filter and an activated carbon filter.</p>	<p>PTI 35-15, SC IV.1. The permittee shall not operate EU-BULBCRUSHER unless the bag filter followed in series by a HEPA filter and an activated carbon filter are installed, maintained, and operated in a satisfactory manner. (R 336.1224, R 336.1910)</p>	<p>The bag filter was sitting on top of the DTC containing white powder, and a hole in the HEPA filter case was covered in black tape. The DTC was leaking as measured during the mercury survey. The air pollution control equipment was not being operated in a satisfactory manner.</p>

Process Description	Rule/Permit Condition Violated	Comments
EU-BULBCRUSHER - One 55-gallon drum-top fluorescent light bulb crusher, controlled by a bag filter followed in series by a HEPA filter and an activated carbon filter.	<p>PTI 35-15, SC VI.1. The permittee shall keep the following information on a monthly basis for EU-BULBCRUSHER:</p> <p>a) The number and size of fluorescent light bulbs crushed per calendar day. b) The number and size of fluorescent light bulbs crushed per calendar month. c) The number and size of fluorescent light bulbs crushed per 12-month rolling time period as determined at the end of each calendar month.</p> <p>The permittee shall keep the records in the format specified in Appendix 3. (R 336.1224)</p>	Records of the number and size of fluorescent light bulbs crushed per 12-month rolling time period could not be found.

During this inspection, it was noted that a daily log was being kept of coating and solvent usage and this information was being entered into an electronic database. But, the emission calculations and records for the daily, monthly and 12-month rolling time period were missing as well as the records of the number of booths operating each day.

This is a violation of the recordkeeping requirements specified in PTI 34-00A for FG-COATING - SC III.4, SC VI.3, and SC VI.4; and FG-FACILITY - SC VI.2.

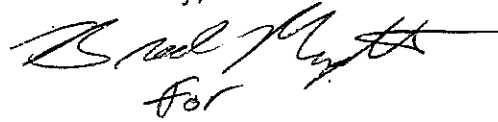
Also, during this inspection AQD staff performed a mercury survey and observed the operation of EU-BULBCRUSHER which is a drum-top fluorescent light bulb crusher (DTC) controlled by a bag filter followed in series by a HEPA filter and an activated carbon filter. The process equipment and the associated air pollution control equipment were not being operated in a satisfactory manner. EU-BULBCRUSHER should not be operated until the air pollution control equipment is repaired, and an operator training program, standard operating procedures, and maintenance program have been developed.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 21, 2016. 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 recurrence.

If you believe 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. 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,

A handwritten signature in black ink, appearing to read "Brad Myott".

for

Julie L. Brunner, P.E.
Senior Environmental Engineer
Lansing District Office
Air Quality Division
517-284-6789

cc: Mr. Brad Myott, DEQ
cc/via e-mail: Ms. Cherie Isaac, TIDI CFI
Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ

