



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 5, 2014

Mr. Kent Brown
BOS Manufacturing
100 South Glocheski Drive
Manistee, Michigan 49660

SRN: N1965, Manistee County

Dear Mr. Brown:

VIOLATION NOTICE

On August 11, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of BOS Manufacturing, formerly known as MasTech, Inc., located at 290 South Washington Street and 100 South Glocheski Drive, in Manistee, Michigan. The purpose of this inspection was to determine BOS Manufacturing'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 administrative rules and the conditions of Permit to Install (PTI) number 76-09.

During this inspection, BOS Manufacturing was unable to produce emission records for the coating booth, and no records have been kept for the coating booth at the facility.

This is a violation of the recordkeeping and emission limitations specified in Special Condition number III.A.1 and III.A.2 of PTI number 76-09.

The conditions of PTI number 76-09 require the following:

- a) Monthly record of purchase orders and invoices for all coatings, reducers, and purge/clean-up solvents.
- b) Monthly record of the VOC content in pounds per gallon of all reducers and purge/clean-up solvents, the usage rate in gallons and disposal records.
- c) Monthly record of the VOC content in pounds per gallon of each coating and the usage rate in gallons.
- d) Monthly and annual VOC emission rate calculations for each coating line, in tons per month and tons per 12-month rolling time period, using the method specified in Appendix B.

- e) Annual records, based upon a 12-month rolling time period, of the actual VOC emission rate in tons per year for all coating lines and associated purge and clean-up operations at the stationary source.
- f) Date and description of any modification or new installation of process or control equipment for the coating line.
- g) Date and description of any coating change or replacement on the coating line.
- h) The permittee shall maintain a current listing of the chemical composition of each coating, including the weight percent of each component. The data may consist of material safety data sheets, manufacturer's formulation data, or both. The records are for the purpose of compliance demonstration and shall be kept on file for a period of at least five years and made available to the Department upon request.
- i) For a coating line using add-on control to meet the requirements of this general permit, see Section VI for additional monitoring requirements.

The DEQ has supplied BOS Manufacturing a copy of PTI 76-09, which includes the required recordkeeping form. The DEQ understands BOS Manufacturing will begin keeping the required records and calculations associated with the coating booth, to correct the violation and prevent a reoccurrence. Please respond with the date that the recordkeeping required by PTI 76-09 was begun.

If BOS Manufacturing 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 violation cited above and for the cooperation that was extended to me during my inspection of BOS Manufacturing. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Caryn Owens
Environmental Quality Analyst
Air Quality Division
231-876-4414

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Janis Ransom, DEQ