



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

June 4, 2015

Ms. Paula Giordano, SA & O Manager  
TTX Company Draco Division  
5225 Williams Lake Road  
Waterford, MI 48329

Mr. John Marsh, Director of Operations  
Highwood Die & Engineering  
1353 Highwood  
Pontiac, MI 48340

SRN: N2112, Oakland County

Dear Ms. Giordano and Mr. Marsh:

**VIOLATION NOTICE**

On May 7, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of your facility, TTX Company Draco Division, located at 5225 Williams Lake Road, Waterford, Michigan. The purpose of this inspection was to determine your facility'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) No. 13-13.

During the inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUSPRAYBOOTH	PTI No. 13-13 special condition EUSPRAYBOOTH(I)(2)	2,000 lb./month permit limit was exceeded a total of 7 months from PTI issuance in March 2013 through April 2015.
	DEQ-AQD Administrative Rule R 336.1621 (Rule 621)	Violation of Rule 621 because the company exceeded the exemption limit found in R 336.1621(10)(a).
EUSPRAYBOOTH	PTI No. 13-13 special condition EUSPRAYBOOTH(I)(1)	10 tons/year or 20,000 lb./year permit limit based on monthly recorded 12-month rolling total VOC emission rate

	DEQ-AQD Administrative Rule R 336.1621 (Rule 621)	was exceeded a total of 10 months from PTI issuance in March 2013 through April 2015.  Violation of Rule 621 because the company exceeded the exemption limit found in R 336.1621(10)(a).
EUSPRAYBOOTH	PTI No. 13-13 special condition EUSPRAYBOOTH(VI) (4)(e)	No records of Ethylbenzene emission calculations of annual VOC emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
FGFACILITY	PTI No. 13-13 special condition FGFACILITY(VI)(2)(e)	No records of each individual HAP and the aggregate HAP emission calculations of annual emission rates in tons per 12-month rolling time period as determined at the end of each calendar month.

During the AQD staff inspection, the facility was unable to produce records of Ethylbenzene, individual HAP, and the aggregate HAP emission calculations of annual emission rates in tons per 12-month rolling time period as determined at the end of each calendar month. The VOC emission rate records obtained from the facility showed noncompliance with the emission unit, EUSPRAYBOOTH, VOC monthly emission rate of 2,000 lb./month permit limit a total of 7 months from PTI issuance in March 2013 through April 2015. Likewise, the VOC emission rate records obtained from the facility showed noncompliance with the emission unit, EUSPRAYBOOTH, annual VOC emission rate of 10 tons/year or 20,000 lb./year permit limit, based on monthly recorded 12-month rolling totals, a total of 10 months from PTI issuance in March 2013 through April 2015. These observations were in violation of special conditions in PTI No. 13-13 as shown in the above table.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 25, 2015 (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.

If the facility 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.

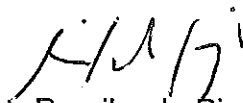
Ms. Paula Giordano  
Mr. John Marsh

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June 4, 2015

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to AQD staff during our inspection of your facility. 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,



Remilando Pinga  
Senior Environmental Engineer  
Air Quality Division  
586-753-3744

RP/DC

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ