



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

July 14, 2016

Mr. Bryan Schindler
Kerkau Manufacturing
1310 South Valley Center Drive
Bay City, MI 48706

SRN: N2147, Bay County

Dear Mr. Schindler:

VIOLATION NOTICE

On June 14, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Kerkau Manufacturing located at 910 Truman Parkway, Bay City, Michigan. The purpose of this inspection was to determine Kerkau 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 137-96.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Process	PTI 137-96; Condition #13	Monthly VOC emission exceedance. Limit is 2,000 pounds per month, the facility reports up to 4,224 pounds per month in March 2016. Annual limit of 9.9 tpy exceeded, 17.05 tpy reported for 2015.

The records provided demonstrate that actual emissions of VOCs from the coating process are 17.05 ton per year (2015) and the conditions of PTI number(s) 137-96 limit the emissions of VOCs to 9.9 ton per year.

Please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at the following website:

http://www.michigan.gov/documents/deq/deq-ess-caap-pte-workbook-part1_314116_7.pdf

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 8, 2106 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a recurrence.

If Kerkau 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 Kerkau 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,



Gina L. McCann
Environmental Quality Analyst
Air Quality Division
989-894-6218

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Hare, DEQ