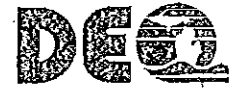




RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



DAN WYANT  
DIRECTOR

August 27, 2015

Mr. Artie McElwee, President and CEO  
Toefco Engineered Coating Systems, Inc.  
1220 North 14th Street  
Niles, Michigan 49120

SRN: N2610, Berrien County

Dear Mr. McElwee:

**VIOLATION NOTICE**

On August 11, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Toefco Engineered Coating Systems, Inc. (Facility), located at 1220 North 14th Street, Niles, Michigan. The purpose of this inspection was to determine the 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) Nos. 225-07B, 32-01A, 214-03, 222-03, 223-03, and 224-03.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-MetalCoat	Special Condition I.2 under the Emission Limits of PTI No. 225-07B.	The Facility has intermittently been exceeding the daily emission limits for Xylene.
EU-MetalCoat	Special Condition II.1 under the Material Limits of PTI No. 225-07B.	The Facility has used coatings that exceeded the 3.25 lb/gal volatile organic compound limit when the regenerative thermal oxidizer (RTO) was not in operation.
FG-Facility	Special Condition I.1 under the Emissions Limits of PTI No. 225-07B.	The Facility exceeded the 9.0 ton per year Opt-Out emission limit for an individual hazardous air pollutant (HAP) (Xylene).
FG-Facility	Rule 336.1210 of Part 55 of Act 451.	The Facility exceeded the major source threshold for an individual HAP emission without being covered by a Title V Renewable Operating Permit.

Mr. Artie McElwee

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 24, 2015. 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.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of the Facility. If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Matt Deskins  
Environmental Quality Analyst  
Air Quality Division  
269-567-3542

MD:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Mary Douglas, DEQ