



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

September 24, 2014

Mr. Scott Miller, Plant Engineer
Spectrum Industries
13 McConnell Street SW
Grand Rapids, Michigan 49503

SRN: N6218, Kent County

Dear Mr. Miller:

VIOLATION NOTICE

On August 27, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Spectrum Industries located at 13 McConnell Avenue in Grand Rapids, 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 Permit to Install Nos. 277-97 and 142-13.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Clear coat line (EUMCCUBIC)	PTI No. 277-97, Special Condition No. 17	The company is not maintaining up-to-date coating VOC content records. Coating VOC content (in pounds/gallon) from the manufacturer does not match those used in emission calculations.
Clear coat line (EUMCCUBIC)	PTI No. 277-97, Special Condition No. 21	High Volume Low Pressure (HVLP) spray guns or similar technology with comparable or better transfer efficiency are not being used on the robot booths.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 15, 2014 (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 Spectrum Industries 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 number listed below.

Sincerely,



David L. Morgan
Environmental Quality Analyst
Air Quality Division
616-356-0009

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