



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 25, 2020

Mr. Brian Borowski, Partner
Premier Finishes LLC
28060 Groesbeck Highway
Roseville, Michigan 48066-2345

SRN: N7896, Macomb County

Dear Mr. Borowski:

VIOLATION NOTICE

On August 30, 2019, September 13, 20, and 27, 2019, October 16, 2019, and August 7, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted inspections of Premier Finishes LLC located at 28060 Groesbeck Highway, Roseville, Michigan. The purpose of these inspections were to determine Premier Finishes LLC'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 Air Pollution Control Rules; the conditions of Permit to Install (PTI) number 36-18; and Administrative Consent Order (ACO) AQD No. 2019-05.

During the inspections, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBOOTHS	PTI No. 36-18 FGBOOTHS Special Condition VII.1, and ACO AQD No. 2019-05, paragraph 9.C.1.	The permittee failed to submit records on a monthly basis from August 2018 through February 2019, October through November 2019, and February through June 2020.
FGBOOTHS	PTI No. 36-18 FGBOOTHS Special Condition IV.1, and ACO AQD No. 2019-05, paragraph 9.A.1.	The dampers that regulate the exhaust system on the double-wide spray booth have not been maintained in a satisfactory manner from August 30, 2019, through August 7, 2020.
FGBOOTHS	PTI No. 36-18 FGBOOTHS Special Condition IV.1, and ACO AQD No. 2019-05, paragraph 9.A.1.	The permittee operated FGBOOTHS while all respective exhaust filters were not installed, maintained, and operated in a satisfactory manner from August 30, 2019, through August 7, 2020.

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Premier Finishes LLC failed to submit records on a monthly basis from August 2018 through February 2019, and October through November 2019, as required per PTI No. 36-18 FGBOOTHs Special Condition VII.1, and ACO AQD No. 2019-05, paragraph 9.C.1.

On February 2, 2020, the AQD emailed the following request to Premier Finishes LLC, "Per PTI No. 36-18, FGBOOTHs, VII.1, please continue to submit monthly paint and cleaning solvent logs through December 2020."

Premier Finishes LLC failed to submit records on a monthly basis from February through June 2020, as required per PTI No. 36-18 FGBOOTHs Special Condition VII.1, and ACO AQD Condition No. 9.C.1.

The aforementioned failures to submit reports are violations of the reporting requirements specified in Special Condition VII.1 of PTI number 36.18 and ACO AQD No. 2019-05, paragraph 9.C.1., which states, "Per PTI No. 36-18 FGBOOTHs Special Condition VII.1, The permittee shall submit reports on a monthly basis for the first 12 months after permit issuance, quarterly reports for the following 12 months after permit issuance and reports every six months thereafter. After a minimum of one (1) year of six-month reporting, the company may petition the AQD District Supervisor to reduce the frequency of reporting and/or request to terminate reporting. If at any time the reporting/recordkeeping is found to be unsatisfactory or is not submitted within the required timeframe, the AQD may require the permittee to submit monthly reports for a minimum of 12 months and then resume six-month reporting if the monthly reports are deemed satisfactory. All reports shall be submitted to the AQD District Supervisor by the 15th of the following month for the previous month records."

From August 30, 2019, through August 7, 2020, Premier Finishes LLC failed to maintain, in a satisfactory manner, the exhaust system on the double-wide spray booth. The exhaust system malfunction caused the spray booth pressure drop gage to indicate an exceedance of the manufacturer's operating specifications. This is a violation of the design and equipment parameter requirements specified in Special Condition IV.1 of PTI No. 36-18, which states, "The permittee shall not operate FGBOOTHs unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner."

From August 30, 2019, through August 7, 2020, Premier Finishes LLC operated FGBOOTHs while all respective exhaust filters were not installed, maintained, and operated in a satisfactory manner because the permittee failed to clear materials obstructing the control device ventilation system. This is a violation of the design and equipment parameter requirements specified in Special Condition IV.1 of PTI No. 36-18, which states, "The permittee shall not operate FGBOOTHs unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner."

The cited Special Condition IV.1 of PTI number 36-18 is also enforceable under paragraph 9.A.1 of ACO AQD No. 2019-05.

The cited Special Condition VII.1 of PTI number 36-18 is also enforceable under paragraph 9.C.1 of ACO AQD No. 2019-05.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 15, 2020 (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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Premier Finishes LLC 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 each inspection. 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,



Robert Elmochi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. Jeff Rathbun, EGLE