



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 1, 2021

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

SRN: N7896, Macomb County

Dear Mr. Borowski:

VIOLATION NOTICE

On March 17 and May 14, 2021, 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 was 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 Consent Order AQD number 2019-05.

During the inspections, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBOOTHS	PTI No. 36-18, FGBOOTHS Special Condition III.1, and Consent Order AQD No 219-05, 9.A.1.	The permittee failed to capture all waste materials and store them in closed containers.
FGBOOTHS	PTI No. 36-18, FGBOOTHS Special Condition III. 3, and Consent Order AQD No 219-05, 9.A.1.	The permittee failed to handle all VOC and HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions; and the permittee failed to keep containers covered at all times except when operator access is necessary.

FGBOOTHs	PTI No. 36-18, FGBOOTHs Special Condition III.4, and Consent Order AQD No 219-05, 9.A.1.	The permittee failed to identify and clearly label EUBOOTH1 and EUBOOTH2 according to a method acceptable to the AQD District Supervisor within 30 days of issuance of PTI No. 36.18.
FGBOOTHs	R 336.1910	The permittee failed to maintain and operate the EUBOOTH2 double-wide spray booth dry particulate filter control device in a satisfactory manner because the exhaust damper control actuator was removed and not replaced. The failure to maintain the damper control actuator resulted in observed pressure drops of -0.12 and -0.10 inches of water column across the dry particulate filter control device, which are outside the manufacturer's specified pressure drop range of 0.00 to +0.80 inches of water column.

During the inspections of March 17 and May 14, 2021, staff observed that Premier Finishes LLC failed to capture all waste materials and store them in closed containers. This constitutes a violation of PTI No. 36-18, FGBOOTHs Special Condition III.1, which states in part, *"The permittee shall capture all waste materials and shall store them in closed containers."* This also constitutes a violation of Consent Order AQD No 219-05, 9.A.1., which states in part, *"On and after the effective date of this Consent Order, the Company shall comply with PTI No. 36-18 and any subsequent permit revision."*

During the inspection of May 14, 2021, staff observed that Premier Finishes LLC failed to handle all VOC and HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions, and the permittee failed to keep containers covered at all times except when operator access is necessary. This constitutes a violation of PTI No. 36-18, FGBOOTHs Special Condition

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III. 3., which states, *“The permittee shall handle all VOC and HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary.”* This also constitutes a violation of Consent Order AQD No 219-05, 9.A.1., which states in part, *“On and after the effective date of this Consent Order, the Company shall comply with PTI No. 36-18 and any subsequent permit revision.”*

During the inspections of March 17 and May 14, 2021, staff observed that Premier Finishes LLC failed to identify and clearly label EUBOOTH1 and EUBOOTH2 according to a method acceptable to the AQD District Supervisor within 30 days of issuance of PTI No. 36.18. This constitutes a violation of PTI No. 36-18, FGBOOTHs Special Condition III.4, which states, *“The permittee shall identify and clearly label EUBOOTH1 and EUBOOTH2 according to a method acceptable to the AQD District Supervisor within 30 days of issuance of this permit.”* This also constitutes a violation of Consent Order AQD No 219-05, 9.A.1., which states in part, *“On and after the effective date of this Consent Order, the Company shall comply with PTI No. 36-18 and any subsequent permit revision.”*

During the inspection of May 14, 2021, staff observed that Premier Finishes LLC failed to maintain and operate the EUBOOTH2 double-wide spray booth dry particulate filter control device in a satisfactory manner because the exhaust damper control actuator was not replaced or repaired. The failure to maintain the damper control actuator resulted in observed pressure drops of -0.12 and -0.10 inches of water column, which are outside the manufacturer’s specified pressure drop range of 0.00 to +0.80 inches of water column. This constitutes a violation of R 336.1910 of the administrative rules promulgated under Act 451, which states, *“An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with these rules and existing law.”*

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 22, 2021 (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.

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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 my inspections of March 17 and May 14, 2021. 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 Elmouchi
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