



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

September 19, 2014

Mr. Kim Zeile  
Prefix Corporation  
1300 W. Hamlin Road  
Rochester Hills, MI 48309-3361

SRN: P0204, Oakland County

Dear Mr. Zeile:

**VIOLATION NOTICE**

On August 28, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Prefix Corporation (Prefix) located at 1300 West Hamlin Road and 1601 West Hamlin Road, Rochester Hills, Michigan. The purpose of this inspection was to determine Prefix'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); and the administrative rules.

During the inspection of August 28, 2014, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Three spray booths	R 336.1201	Prefix installed and operated three spray booths without obtaining an approved air use permit to install (PTI).

During this inspection, it was noted that Prefix had installed and commenced operation of three unpermitted spray booths at this facility. The AQD staff advised Prefix on September 16, 2014, that this is a violation of Act 451, Rule 201.

On September 3, 2014, the AQD received records that indicate the total combined coating usage rate in all three spray booths exceeded 200 gallons per month in March 2013, June 2013, June 2014 and July 2014. Because Prefix did not track the coating usage rate per spray booth, Prefix cannot demonstrate that the coating use rate of any individual spray booth did not exceed the 200 gallons per month limit per Rule 287(c). Therefore, Prefix failed to demonstrate that each spray booth is exempt from the Rule 201 requirement to obtain a Permit to Install.

A program for compliance may include a completed Opt-Out Permit to Install (PTI) application for the spray booth process equipment, which would limit Prefix's potential to emit below major source thresholds. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml#AUP](http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP)

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Additionally, since March 15, 2012, Prefix failed to submit an annual Rule 208a registration, which establishes a temporary legally enforceable limit on the source's potential to emit. Please be advised that Rule 208a is scheduled to be rescinded in 2015 and therefore is no longer a compliance option. A program for compliance may include a completed Opt-Out PTI application for the processes at your facility, which would limit Prefix's potential to emit below major source thresholds. An application form is available by request, or at the website listed above.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **October 17, 2014**. 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 Prefix Corporation 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 August 28, 2014. 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,



Robert Elmouchi  
Environmental Quality Analyst  
Air Quality Division  
586-753-3736

RE/DC

cc: Mr. John Stempowski, Prefix Corporation  
Mr. Vern Bachman, Prefix Corporation  
Mr. Richard Kraft, Prefix Corporation  
Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ