

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENTAL QUALITY





DAN WYANT DIRECTOR

August 24, 2015

<u>CERTIFIED MAIL - 7007 3020 0002 7737 4481</u> <u>RETURN RECEIPT REQUESTED</u>

Mr. Chuck Mohlman Elm Plating Company 533 Hupp Street Jackson, Michigan 49203

SRN: P0636, Jackson County

Dear Mr. Mohlman:

VIOLATION NOTICE

On August 6, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Elm Plating Company located at 533 Hupp Street, Jackson, Michigan. The purpose of this inspection was to determine Elm Plating Company'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 this inspection, it was noted that Elm Plating Company had installed and commenced operation of an unpermitted parts coating operation at this facility. The AQD staff also requested Elm Plating Company to provide information to determine whether the parts coating operation may qualify for a Rule 201 exemption. It was determined that the parts coating operation did not meet any exemptions. The AQD staff advised Elm Plating Company on August 17, 2015, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the EIm Plating Company's parts coating operation equipment. An application form is available by request, or at the following website:

http://www.deg.state.mi.us/aps/nsr information.shtml

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.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 14, 2015. The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been

taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please also include a facility-wide potential to emit (PTE) calculation for any applicable criteria pollutants and hazardous air pollutants (HAPs) with your written response to this Violation Notice. To assist with your PTE determination, the *Potential to Emit Workbook* is available at http://www.michigan.gov/documents/deq/deq-ess-caap-pte-workbook-all-281896 7.pdf.

If Elm Plating Company 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 Elm Plating Company. 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,
Michael M. Halv

Michael M. Gabor Environmental Quality Analyst Air Quality Division

(517) 780-5496

cc: Mr. Scott Miller, DEQ

cc/via e-mail: Mr. Allen Kinsler, Elm Plating Company

Ms. Lynn Fiedler, DEQ

Ms. Mary Ann Dolehanty, DEQ

Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ