



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 19, 2021

Mr. Terry Fletcher, Owner
Fletcher Precision Painting
6795 East 9 Mile Road
Warren, MI 48091

SRN: P0790, Macomb County

Dear Mr. Fletcher:

VIOLATION NOTICE

On March 18, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Fletcher Precision Painting located at 6795 East 9 Mile Road, Warren, Michigan. The purpose of this inspection was to determine Fletcher Precision Painting'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; and the conditions of Permit to Install (PTI) number 161-17.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Pretreatment and cleaning of metal parts	R 336.1201(1) and EUSOLVENT SC II.1	Fletcher Precision Painting indicated that the facility is now using xylene, which is a volatile organic compound (VOC) and hazardous air pollutant (HAP), instead of acetone in the metal pretreatment process. The existing PTI is based on the use of acetone as the primary solvent and therefore a PTI modification is likely required for this process change.
Pretreatment and cleaning of metal parts	PTI No. 161-17, EUSOLVENT, S.C. I.1	Based on the records provided following the inspection, Fletcher Precision Painting exceeded their permitted yearly acetone emissions.

The records provided demonstrate that actual emissions of acetone from the solvent cleaning process are 983 pounds in calendar year 2020. The conditions of PTI number 161-17 limit the emissions of acetone to 150.3 pounds per year. The records therefore indicate that acetone emissions exceeded the permitted limits.

In addition, following the inspection, Fletcher Precision Painting identified that a modification had been made to the metal pretreatment and cleaning process and that xylene was now being used in that process instead of acetone. The use of xylene as a cleaning solvent, which is both

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a VOC and a HAP, is a violation of EUSOLVENT SC II.1. The AQD staff advised Fletcher Precision Painting on May 13, 2021, that this is also a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the use of xylene in the metal pretreatment and cleaning process. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

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 violations and submit a written response to this Violation Notice by June 9, 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.

If Fletcher Precision 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 Fletcher Precision Painting. 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,



Kaitlyn Leffert
Environmental Quality Analyst
Air Quality Division
586-249-6505

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