



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

April 3, 2023

Michael Bradley
Mike's Paint Shop
14701 US Highway 12
Union, MI 49130

SRN: U142301757, Cass County

Dear Michael Bradley:

VIOLATION NOTICE

On March 1, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Mike's Paint Shop located at 14701 US Highway 12, Union, Michigan. The purpose of this inspection was to determine Mike's Paint Shop 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 to investigate a recent complaint which we received on February 7th and 8th, 2023, regarding foul odors and failure to obtain a Permit to Install attributed to Mike's Paint Shop operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Automobile parts coating operation	R 336.1201	Purchase records indicate the facility exceeds material usage limit of 200 gallons of coating material per month and cannot operate using an exemption from permitting. The facility has not evaluated emissions of Volatile Organic Compounds (VOCs) or Hazardous Air Pollutants (HAPs) on a monthly basis.
Surface grinding and sanding operations	R 336.1201	Staff observed a dust collection system that emitted to the ambient air but did not have filters

		properly installed and operated.
--	--	----------------------------------

EMISSIONS REPORTED OR OBSERVED

The records provided do not demonstrate actual emissions of VOCs or HAPs from the coating process equipment. Staff cannot assess whether emissions exceed the PSD/Major Offset threshold.

NESHAP/NSPS

This process must be assessed for potential subjectivity to any federal New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAP) for coating operations. These standards are found in Title 40 of the Code of Federal Regulations (CFR).

RULE 201 VIOLATIONS

After review of purchase records, it was noted that Mike's Paint Shop had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Mike's Paint Shop on 3/1/2023, that this is 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 coating operation process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

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.

RULE 901

In the professional judgment of AQD staff, the odors that were observed were not of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451, but AQD staff detected odors on the property that indicated a lack of proper filtration of the building exhaust ports. AQD staff suggests the facility assess all facility operations and potential locations where fugitive odors may be emitted to the ambient air to prevent future complaints from the adjacent neighborhood.

RESPONSE/COMPLIANCE PROGRAM/CONCLUSION

Michael Bradley
Mike's Paint Shop
Page 3
April 3, 2023

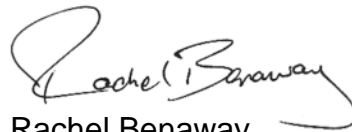
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 24, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Mike's Paint Shop 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 Mike's Paint Shop. 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,



Rachel Benaway
Environmental Quality Analyst
Air Quality Division
269-370-2170

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Rex Lane, EGLE