



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

April 9, 2018

Mr. Jeffery Schwartz
Rollie Williams Paint Spot
1179 Kent Street
Elkhart, Indiana 46514

SRN: A0703, Cass County

Dear Mr. Schwartz:

VIOLATION NOTICE

On March 28, 2018, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), conducted an inspection of Axium Group, LLC located at 708 Sherman Lane, Cassopolis, Michigan. The purpose of this inspection was to determine Axium Group, 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 32-17; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-A0703-2017.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--|---|
| EUSANDER | ROP No. MI-ROP-A0703-2017, EUSANDER, Special Condition (SC) VI.1 | The permittee should be recording weekly pressure drop readings on EUSANDER during peak operating conditions. |
| EUFLATLINE1 | ROP No. MI-ROP-A0703-2017, EUFLATLINE1, SC II.1 | Material limit of the VOC content of Stains is 2.0 lb/gal (minus water) as applied. The facility has five (5) coatings which exceed this limit per the manufacturer's data sheet. |
| EUFLATLINE1 | ROP No. MI-ROP-A0703-2017, EUFLATLINE1, SC II.3 | Material limit of the VOC content of UV Stains, Sealers, and Topcoats is 4.7 lb/gal (minus water) as applied. According to Method 24 testing, the UV Topcoat has a VOC content of 5.0 lb/gal minus water. |
| EUFLATLINE1 | ROP No. MI-ROP-A0703-2017, EUFLATLINE1, SC VI.1 | Facility's current method of recordkeeping is insufficient to show compliance with the permit. See comment below the table. |

| | | |
|---------------|---|--|
| FGFACILITY | ROP No. MI-ROP-A0703-2017, FGFACILITY, SC VI.1 | Facility's current method of recordkeeping is insufficient to show compliance with the permit. See comment below the table and the inspection report. |
| FGWOODCOATING | ROP No. MI-ROP-A0703-2017, FGWOODCOATING, SC I.2 | The acetone limit for FGWOODCOATING is 89.9 tons in a 12-month rolling time period. Adding up records submitted to the department for EUWOODCOATING1-5 and EUREPAIRBOOTH, overages were found in January 2017 (91.04 tons), February 2017 (92.29 tons), and March 2017 (91.68 tons). |
| FGWOODCOATING | ROP No. MI-ROP-A0703-2017, FGWOODCOATING, SC II.1 | Material limit for the VOC content of Stains is 3.4 lb/gal (minus water) as applied. Method 24 testing showed three (3) stains are above this limit. |
| FGWOODCOATING | ROP No. MI-ROP-A0703-2017, FGWOODCOATING, SC VI.1 | Facility's current method of recordkeeping is insufficient to show compliance with the permit. See comment below the table. |
| FGDIPTANKS | ROP No. MI-ROP-A0703-2017, FGDIP TANKS, SC V.1 | Method 24 testing is required on an annual basis of the most frequently used stain. |
| FGDIPTANKS | ROP No. MI-ROP-A0703-2017, FGDIP TANKS, SC VI.1 | Facility's current method of recordkeeping is insufficient to show compliance with the permit. See comment below the table. |

During this inspection, Axium Group, LLC was unable to produce sufficient emission records to demonstrate compliance with the permit.

As it is detailed in the inspection report, emission records must list gallons of each listed component, used and reclaimed where applicable. The VOC content of each component, minus water and with water, must be recorded. The mass emission calculations, both monthly and 12-month rolling should be calculated from this information. It should also be easily verifiable by the Department to prove compliance with the emissions limits listed in the permit.

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Rollie Williams Paint Spot
Page 3
April 9, 2018

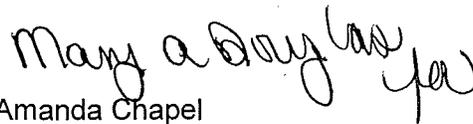
Currently, records for EUFLATLINE1, FGFACILITY, FGWOODCOATING, and FGDPTANKS do not include gallons of each component used and reclaimed and VOC content of each component. Records do show monthly emission numbers and 12-month rolling. However, the numbers submitted do not have any mathematical backing to prove emissions are below the limit as no calculations are included. For the department to verify the reported emissions, the records would need to be recreated in their entirety, which is not practicable.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 30, 2018 (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.

If Axium Group, 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 inspection of Axium Group, LLC. 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,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
269-910-2109

cc: Ms. Mary Douglas, MDEQ
cc/via e-mail: Mr. Doug Elliott, D&B Environmental
Ms. Mary Ann Dolehanty, MDEQ
Mr. Craig Fitzner, MDEQ
Mr. Chris Ethridge, MDEQ
Mr. Malcolm Mead-O'Brien, MDEQ