



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 18, 2021

Mr. Erik Klimek
Expert Coating Company, Inc.
2855 Marlin Court NW
Grand Rapids, Michigan 49534

SRN: A2722, Kent County

Dear Mr. Klimek:

VIOLATION NOTICE

On January 20, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), reviewed burn-off oven records for Expert Coating Company, Inc. located at 2855 Marlin Court NW, Grand Rapids, Michigan. The purpose of this review was to determine Expert Coating Company, Inc.'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 317-74A; and Consent Order AQD number 2-2015.

During the records review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Burn-off Oven (EUBURNOFF)	PTI No. 317-74A, EUBURNOFF, Special Condition (SC) IV.1 and Consent Order AQD No. 2-2015, paragraph 9.c	Afterburner temperature below 1,400°F during operation of the primary oven chamber.

Based on burn-off oven (EUBURNOFF) temperature records provided by the facility on January 19, 2021, for the time period of June - November 2020, there were 50 instances when the recorded afterburner temperature was below 1,400°F while the main oven chamber was also operating. A minimum afterburner operating temperature of 1,400°F is required by PTI 317-74A, EUBURNOFF, SC IV.1 to ensure proper combustion of any potential pollutants. Therefore, operating below this temperature constitutes a violation of this requirement.

The cited violation is also enforceable under paragraph 9.c of Consent Order AQD number 2-2015.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 11, 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, Grand Rapids District Office, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Expert Coating Company, Inc. 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. 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,

Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-286-0083

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