



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 19, 2019

Mr. Jeff Poniewierski
Process Improvement Supervisor
Akzo Nobel Coatings Inc.
120 Franklin Road
Pontiac, MI 48341

SRN: B4145, Oakland County

Dear Mr. Poniewierski:

VIOLATION NOTICE

On December 18, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Akzo Nobel Coatings Inc. located at 120 Franklin Road, Pontiac, Michigan. The purpose of this inspection was to determine Akzo Nobel Coatings 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; and the conditions of Permit to Install (PTI) number 184-06.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
One Kohler, natural gas fired, 121 kW (162 hp) emergency generator (RICE).	40 CFR Part 60 – Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.	Facility has installed and commenced operation of an emergency RICE which has not been certified by the USEPA. The facility also failed to conduct emission testing to verify compliance with emission limits specified in 40 CFR Part 60 – Subpart JJJJ.

During the inspection AQD staff noted that Akzo Nobel Coatings Inc. has installed and commenced operation of one Kohler, natural gas fired, 121 kW (162 hp) emergency generator. This generator is not certified by the EPA for compliance with 40 CFR Part 60 – Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (Subpart JJJJ). Akzo Nobel Coatings Inc. failed to conduct a performance test on the emergency generator within the time period specified in Subpart JJJJ. Additionally, Akzo Nobel Coatings Inc. must comply with all applicable regulations in Subpart JJJJ.

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This engine is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines. These standards are found in 40 CFR Part 63, Subpart ZZZZ.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 12, 2019 (which coincides with 21 calendar days from the date of this letter). 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 submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Akzo Nobel Coatings 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 violation cited above and for the cooperation that was extended to me during my inspection of Akzo Nobel Coatings Inc. 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,



Adam Bogner
Environmental Engineer
Air Quality Division
586-753-3744

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