



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

October 15, 2013

Mr. Paul Barick  
Director of Quality, Environmental and Safety  
Romeo RIM, Inc.  
74000 Van Dyke Avenue  
Romeo, Michigan 48065

SRN: B5854, Macomb County

Dear Mr. Barick:

**VIOLATION NOTICE**

On September 18, 2013, the Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) received from Romeo RIM, Inc. located at 74000 Van Dyke Avenue, Romeo, Michigan, its Renewable Operating Permit (ROP) Semi-Annual Certification and Deviation Reports and the Semi-Annual Compliance Report for 40 CFR 63, Subpart PPPP-National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products which were due by September 15, 2013. The purpose of these reports is to demonstrate Romeo RIM'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 administrative rules, and the Renewable Operating Permit (ROP) number MI-ROP-B5854-2009.

The alleged violations include the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-PLT2-LINE1 FG-PLT1-RIM-IMP FG-PLT1-SCL1256&SCL34 FG-RIMPROCESS FG-MACT FG-COLDCLEANERS	MI-ROP-B5854-2009, General Condition 19 and 23, EU-PLT2-LINE1 FG-PLT1-RIM-IMP FG-PLT1-SCL1256&SCL34 FG-RIMPROCESS FG-MACT FG-COLDCLEANERS Section VII, SC 1 & 2	Permittee did not submit the January 1-June 30, 2013, Renewable Operating Permit Semi-Annual Report Certification by the due date of September 15, 2013.

FG-MACT	MI-ROP-B5854-2009 FG-MACT Section VII, SC 4 & 6	Permittee did not submit the January 1-June 30, 2013 Semi-Annual Compliance Report for 40 CFR 63, Subpart PPPP-National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products by the due date of September 15, 2013.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **November 4, 2013**. 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 Romeo Rim, 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,



Sebastian G. Kallumkal  
Senior Environmental Engineer  
Air Quality Division  
586-753-3738

SK/DC

cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ