



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

February 8, 2018

Mr. Wade J. Spurlin  
Environmental and Quality Coordinator  
Romeo RIM, Inc.  
74000 Van Dyke Avenue  
Romeo, Michigan 48065

SRN: B5854, Macomb County

Dear Mr. Spurlin:

**VIOLATION NOTICE**

On December 21, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Romeo RIM, Inc. located at 74000 Van Dyke Avenue, Romeo, Michigan. The purpose of this inspection was to determine 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 Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B5854-1015a.

During the review of the records, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-PLT2-LINE1, EU-PLT2-RIM45, FG-PLT1-RIM-IMP, FG-PLT1-SCL1 and 2, FG-RIMPROCESS, FG-SHUTTLECLAMP, FGROTARY	MI-ROP-B5854-2015a SC V.1	Facility is required to conduct random testing of non-water borne coating, as applied, for VOC content, solids content, and density, using federal Reference Test Method 24 or EPA approved method, on a yearly basis with all coatings tested within a five-year period. Facility did not comply with this requirement for 2016 and 2017.
FGROTARY	MI-ROP-B5854-2015a, SC II.1	This condition limits the instantaneous VOC content of the coating, as applied, to 4.2 lb/gal (minus water). The records show that the actual VOC (less exempt solvents) exceeded this limit during several days during March through November 2017.

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FGROTARY	MI-ROP-B5854-2015a, SC IV.4	This condition requires the facility to keep records of gallons of coatings, with two (2), 4-pentanedione used or reclaimed, and the content of two (2), 4-pentanedione in coatings.
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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 1, 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 recurrence.

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 and for the cooperation that was extended to me during my inspection of December 21, 2017. 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

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Joyce Zhu, DEQ