GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

LIESL EICHLER CLARK
DIRECTOR

January 22, 2019

Mr. Ajay Jain, Environmental Manager
Curtis Metal Finishing Company
6645 Sims Drive
Sterling Heights, MI 48313

SRN: B6455, Macomb County

Dear Mr. Jain:

VIOLATION NOTICE

On January 7, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a performance test report from Curtis Metal Finishing Company located at 6645 Sims Drive, Sterling Heights, Michigan. The report was prepared by H&H Monitoring, Inc. on December 11, 2018 and is titled "Determination of VOC capture and destruction efficiency coating line Nos. 18 and 19." This performance test was conducted on October 18, 2018 to test the VOC capture and destruction efficiency for two new dip spin coating lines and an associated shared regenerative thermal oxidizer. The purpose of this test was to determine Curtis Metal Finishing Company's compliance with the VOC capture and destruction efficiency requirements of Permit to Install No. 383-00H.

While reviewing the report, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Two dip spin coating lines (Line 18 and Line 19) used for coating miscellaneous metal parts. Both lines are controlled by a shared regenerative thermal oxidizer (RTO3).	PTI No. 383-00H FGDIPSPINS2 – Special Condition IV-1	Failed to achieve the required VOC capture efficiency of 85%

Permit to Install No. 383-00H – FGDIPSPINS2 – Special Condition IV-1 states that Curtis Metal Finishing Company shall not operate FGDIPSPINS2 unless RTO3 is installed, maintained and operated in a satisfactory manner. Satisfactory operation of FGDIPSPINS2 includes a minimum capture efficiency of 85 percent (by weight), a minimum destruction efficiency for the regenerative thermal oxidizer of 95% (by weight) and maintaining a minimum temperature of 1400 °F or the minimum temperature from the most recent acceptable stack test, and a minimum retention time of 0.5 seconds.

According to the performance test report, Curtis Metal Finishing Company was able to achieve the minimum destruction efficiency but was not able to achieve the minimum capture efficiency. During the three test runs performed, the average capture efficiency was 59.9%. Operating FGDIPSPINS2 while its control system capture efficiency is less than 85% is a violation of Permit to Install No. 383-00H – FGDIPSPINS2 – Special Condition IV-1.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 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 Curtis Metal Finishing Company 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. 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 Bognar
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