



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYHER  
DIRECTOR

November 14, 2018

Ms. Joy Garvey  
Fastener Coatings, Inc.  
1111 River Road  
Three Rivers, Michigan 49093

SRN: N0760, St. Joseph County

Dear Ms. Garvey:

**VIOLATION NOTICE**

On October 30, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Fastener Coatings, Inc., (Facility), located at 1111 River Road, Three Rivers, Michigan. The purpose of this inspection was to determine the Facility'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) No. 171-03A and 216-00.

During the inspection, staff of the AQD observed the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
Burn-off oven (EU-PO2)	Permit No.171-03A, Special Condition VI.3. of EU-PO2.	Temperature records not being kept for the burn-off afterburner.
Burn-off oven (EU-PO2)	Permit No.171-03A, Special Condition VI.2. of EU-PO2.	Records of calibration of the thermocouples of the burn-off oven were not available.
Coating operation	Permit No.171-03A, Special Condition VI.2.(a),(b), and (c) of FGFACILITY.	Some hazardous air pollutant (HAP) containing materials were not included in recordkeeping (Booth Strip, Polane B Clear, Polane Flattening Base, and Phoenix Colorant contain toluene).
Coating operations	Permit No. 216-00, Special Condition 7. Volatile organic compounds (VOC) content of coatings need to be determined by Method 24.	The VOC content of Polane White and Polane Black was calculated to be higher than what is used in the recordkeeping sheets.

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During this inspection, the Facility was unable to produce records of the burn-off oven afterburner temperatures, and calibration records of the thermocouples of the burn-off oven primary chamber and afterburner.

This is a violation of the recordkeeping specified in Special Conditions EU-P02 VI. 2., and 3., of PTI No. 171-03A.

The conditions of PTI No. 171-03A require maintenance of records maintenance of records, which shall be made available for review upon request by the AQD staff.

Some HAP materials that contain toluene did not appear on the recordkeeping sheets. Specifically, these are Booth Strip, Polane B Clear, Polane Flattening Base, and Phoenix colorant. Special Condition FG FACILITY VI. 2.a. of PTI No. 171-03A requires keeping records of each HAP containing material used.

Based on the Safety Data Sheets for Polane Strobe White and Polane B Static Black, the VOC content was calculated during the inspection to be higher than what is used in the recordkeeping sheets. Special Condition 7. of PTI No. 216-00 requires that Method 24 be used to determine the VOC content of coatings unless prior approval is given by AQD to use formulation data. A record of prior approval was not found. Method 24 testing of the three most used coatings to include Polane White, Polane Black, and Polane Mixed is required.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 5, 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.

Please submit the written response to the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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 the Facility.

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If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,

A handwritten signature in black ink that reads "Dennis Dunlap". The signature is written in a cursive style with a large, prominent "D" at the beginning.

Dennis Dunlap  
Environmental Quality Specialist  
Air Quality Division  
269-567-3553

DD:CF

Enclosure

cc: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Mary Douglas, DEQ