



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
JACKSON DISTRICT OFFICE



DANIEL EICHINGER  
ACTING DIRECTOR

May 1, 2023

**VIA E-MAIL AND U.S. MAIL**

Michelle Byrnes  
Dapco Industries  
2500 Bishop Circle East Dexter, MI  
48130

SRN: N3267, Washtenaw County

Dear Michelle Byrnes:

**VIOLATION NOTICE**

On April 27, 2023, the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD), received methylene chloride emission records for the last 4 years from Dapco Industries (Company) located at 2500 Bishop Circle East, Dexter, Michigan. These emission records were reviewed to determine the Company'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) and the associated Air Pollution Control Rules, and conditions of Permit to Install (PTI) 470-97.

After the records review was completed, AQD staff determined the following:

Process Description	Rule/Permit Condition Violated	Comments
Batch vapor degreaser using methylene chloride.	PTI 470-97, Special Condition 13.	Degreaser has a 9.5 tons per year synthetic minor emission limit based on a 12-month rolling time period. Records show that this limit has been exceeded on 7 separate months over the last 4 years with a maximum rolling average of 9.9 tons recorded.
Batch vapor degreaser using methylene chloride	Rule 210	The facility exceeded their synthetic minor emission limit for hazardous air pollutants (HAPs).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 22, 2023. The written response should include: the

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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.

Please submit written response to the EGLE, AQD Jackson District, at 301 East Louis B Glick Highway, Jackson, Michigan 49201, and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

If the 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 violations cited above and for the cooperation that was extended to me during my recent inspection. 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,



Mike Kovalchick  
Senior Environmental Engineer  
Air Quality Division  
517-416-5025

cc: Scott Miller, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Jeff Rathbun, EGLE