STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE

RICK SNYDER
GOVERNOR

DAN WYANT
DIRECTOR

January 6, 2015

Mr. Greg Rawlings
Nylok LLC
15260 Hallmark Court
Macomb, Michigan 48042

SRN: N5656, Macomb County

Dear Mr. Rawlings:

VIOLATION NOTICE

On January 2, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a Notification of Compliance Status from Nylok LLC located at 15260 Hallmark Court, Macomb, Michigan. The notification is required per Consent Order AQD number 44-2014 paragraph 9.B.1 and pursuant to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products (40 CFR Part 63, Subpart MMMM). The notification indicated that from November 30, 2013 to November 30, 2014, the total mass of organic hazardous air pollutant (HAP) levels in the coatings and thinners used at the source exceeded the emission limit of 2.6 lbs per gal of coating solids, as required per 40 CFR Part 63, Subpart MMMM, §63.3890(b)(1) and Permit to Install (PTI) No. 133-13, FGMACT Special Condition (SC) No. I.2.

As a result, the following violations were identified:

Process Description	Rule/Permit Condition Violated	Comments
FGMACT surface coating equipment in PTI No. 133-13	PTI No. 133-13, FGMACT SC No. I.2; 40 CFR §63.3890(b)(1)	Nylok LLC failed to comply with the emission limit of 2.6 lbs HAPs per gal of coating solids in PTI No. 133-13 and 40 CFR Part 63, Subpart MMMM.
FGMACT surface coating equipment in PTI No. 133-13	Consent Order AQD No. 44-2014 paragraph 9.B.2	Nylok LLC was not in compliance with all applicable requirements of 40 CFR 63, Subpart MMMM on and after the effective date of Consent Order AQD No. 44-2014.
FGMACT surface coating equipment in PTI No. 133-13	Consent Order AQD No. 44-2014 paragraph 8	Nylok LLC has not achieved compliance with regulations in accordance with the requirements contained in Consent Order AQD No. 44-2014.

The records provided demonstrate that from November of 2013 to November of 2014, for all months, Nylok LLC exceeded the HAP emissions limit provided in PTI number 133-13. The highest actual emissions on a 12-month rolling time period of organic HAPs from the coating lines was 11.32 lbs per gal of coating solids in November of 2013. The conditions of PTI number 133-13 limit the emissions of HAPS to 2.6 lbs per gal of coating solids.

This process is subject to the federal NESHAP for Surface Coating of Miscellaneous Metal Parts and Products. These standards are found in 40 CFR Part 63, Subpart MMMM.

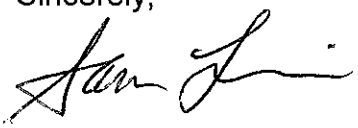
The cited Special Condition number I.2 from emission unit FGMACT of PTI number 133-13 is enforceable as paragraph 13 of Consent Order, AQD number 44-2014.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 27, 2015 (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 reoccurrence.

If Nylok LLC 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,



Samuel Liveson
Environmental Engineer
Air Quality Division
586-753-3749 or livesons1@michigan.gov

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ