



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

December 9, 2016

Mr. Siva Masetty, Mechanical Engineer
Pratt Industries, Inc.
11365 Red Arrow Highway
Bridgman, Michigan 49106

SRN: N7486, Berrien County

Dear Mr. Masetty:

VIOLATION NOTICE

On December 2, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Pratt Industries, Inc. (Facility), located at 11365 Red Arrow Highway, Bridgman, 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. 82-12.

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

Process Description	Rule/Permit Condition Violated	Comments
FG-Coating Lines	Special Condition I.1 of PTI No. 82-12	See Comment 1 below
FG-Coating Lines	Special Condition I.2 of PTI No. 82-12	See Comment 2 below
FG-Facility	Special Condition I.1 and I.2 of PTI No. 82-12	See Comment 3 below
FG-Facility	Special Condition I.3 of PTI No. 82-12	See Comment 4 below
FG-Facility	Special Condition VI.1 and VI.2 (d) and (e) of PTI No. 82-12	See Comment 5 below
Sandblasting	Rule 336.1910 (Rule 910) of Act 451	See Comment 6 below

Comment 1: The volatile organic compound (VOC) emission records provided for the most recent 12-month rolling time period (12-01-15 through 11-30-16) for the two spray booths indicated emissions were 92.96 tons, which is above the 60 ton permit limit.

Comment 2: The Facility had exceeded the 3.5 pound per gallon VOC limit according to their coating usage and emission levels.

Mr. Siva Masetty
Page 2
December 9, 2016

Comment 3: The Hazardous Air Pollutant (HAP) records that were generated to show the 12-month rolling emission totals were not clear and the Facility could not explain what the various emission totals meant. Therefore, compliance with individual and aggregate HAP limits could not be determined.

Comment 4: The VOC emission records provided for the most recent 12-month rolling time period (12-01-15 through 11-30-16) indicated emissions were 92.96 tons, which is over the Facility wide permit limit of 90 tons.

Comment 5: The HAP emission records that were produced by the Facility's electronic database were not clear. Therefore, they were considered to be kept in a non-acceptable format. Since the records were not clear, compliance with emission limits could not be determined.

Comment 6: The sandblasting operation was emitting dust to the outside air. Rule 901 of Act 451 requires that an air cleaning device shall be installed, maintained, and operated in a satisfactory manner, and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 6, 2017. 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 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. 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,



Matt Deskins
Environmental Quality Analyst
Air Quality Division
269-567-3542

MD:CF
Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ