



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 13, 2019

Mr. Donald Megie, President
Mod Interiors, Inc.
9301 Marine City Highway
Ira Township, MI 48023

SRN: N7499, St. Clair County

Dear Mr. Megie:

VIOLATION NOTICE

On February 15, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of your facility located at 9301 Marine City Highway, Ira Township, Michigan. The purpose of this inspection was to determine your 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) number 80-15.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Wood parts coating and adhesive application processes	PTI No. 80-15, Special Conditions FGWOOD (I.1, I.2, and I.3)	Improper recordkeeping of monthly and monthly 12-month rolling totals for VOC and Acetone emissions. No daily records for Light Hydrotreated Distillate.
Wood parts coating and adhesive application processes	PTI No. 80-15, Special Conditions FG FACILITY (I.1, I.2, and I.3)	Improper recordkeeping of monthly 12-month rolling totals for individual and aggregate HAP/s emissions, and Light Hydrotreated Distillate.

PTI No. 80-15, Special Conditions FGWOOD (I.1, I.2, I.3), required the facility to keep records of monthly and monthly 12-month rolling totals for VOC and Acetone emissions, and daily records for Light Hydrotreated Distillate. PTI No. 80-15, Special Conditions FG FACILITY (I.1, I.2, and I.3), required the facility to keep records of monthly 12-month rolling totals for individual and aggregate HAP/s emissions, and Light Hydrotreated Distillate. As part of the February 15, 2019 inspection, MOD Interiors emailed me the

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recordkeeping spreadsheet for VOC and HAPs. I conducted a review process on the records and observed that the VOC records did not include Acetone emissions both for monthly and monthly 12-month rolling totals and no daily recordkeeping for Light Hydrotreated Distillate. The data in each cell of the spreadsheet for monthly 12-month rolling totals for VOC, individual and aggregate HAP/s, were not calculated/reported correctly. The spreadsheet also did not include monthly 12-month rolling totals data for Light Hydrotreated Distillate.

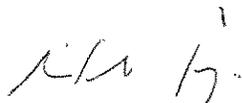
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 10, 2019 (which coincides with 28 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the 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.

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 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 your facility. 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,



Remilando Pinga
Senior 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