



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 13, 2021

Mr. Tyler Lang, General Manager  
Jackson Metal Cleaning  
3507 Wayland Drive  
Jackson, Michigan 49202

SRN: P0915, Ingham County

Dear Mr. Lang:

**VIOLATION NOTICE**

On August 31, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Jackson Metal Cleaning located at 1492 West Grand River Avenue, Williamston, Michigan. Jackson Metal Cleaning provided additional recordkeeping on September 27, 2021, after the inspection report had been completed. These records were reviewed to determine Jackson Metal Cleaning’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 86-20.

During further records review, staff observed the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
EU-BURNOFF (PTI 86-20)	Rules 224 and 225; Special Condition II.2.b	Permitted chlorine content limit for polyurethane caster wheel coatings was exceeded

Information provided by Jackson Metal Cleaning, from Caster Concepts, indicated that the maximum amount of Curene 442, 4,4'-methylene bis(2-chloroaniline) (MOCA) in the caster wheel coating polyurethane is 5% by weight, in comparison to the 2.5% by weight MOCA content that was evaluated during permit application review for PTI 86-20. Based on this information, the maximum chlorine content of the polyurethane burned off in EU-BURNOFF is 1.33%.

This is a violation of the Material Limits specified in Special Condition II.2.b of PTI number 86-20.

This Special Condition requires that the chlorine content for caster wheel polyurethane coatings not exceed 1% by weight.

Mr. Tyler Lang  
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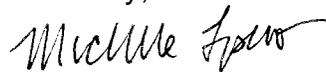
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 3, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 EGLE, AQD, Lansing District, Constitution Hall, First Floor South, 525 West Allegan, Lansing, Michigan 48933 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. Please also email a copy of the response to Michelle Luplow, AQD Lansing District, at [luplowm1@michigan.gov](mailto:luplowm1@michigan.gov).

If Jackson Metal Cleaning 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 violation cited above and for the cooperation that was extended to me. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michelle Luplow  
Environmental Quality Analyst  
Air Quality Division  
517-294-9294

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Brad Myott, EGLE