

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

AIR QUALITY DIVISION



SRN: P0982, Oakland County

November 19, 2024

Mike Fagan, Director of Operations Central Conveyor 52800 Pontiac Trail Wixom, Michigan 48393

Dear Mike Fagan:

VIOLATION NOTICE

On October 15, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Central Conveyor located at 52800 Pontiac Trail, Wixom, Michigan. The purpose of this inspection was to determine Central Conveyor'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 26-19A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Plasma Cutting	Rule 201	The plasma cutting table at the facility has externally vented emissions that are not controlled by appropriately designed fabric filter.
Testing/Sampling	EUPAINTBOOTH Special Condition (S.C.) V.1	Federal Reference Test Method 24 is not being used to determine VOC content of coatings.

During this inspection, it was observed that Central Conveyor had installed and commenced operation of uncontrolled, externally vented plasma cutting equipment at this facility, without obtaining a permit to install. The AQD staff advised Central Conveyor on November 4, 2024 that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

Mike Fagan Central Conveyor Page 2 November 19, 2024

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

A program for compliance may include a completed PTI application for the plasma cutting process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Alternatively, per rule 285 (2)(I)(vi)(C), the requirement of Rule 201(1) to obtain a permit to install does not apply to equipment used for the cutting of metals (including plasma cutting) that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that is preceded by a mechanical pre-cleaner and that is not excluded from exemption per Rule 278.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 10, 2024 (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 Owen Pierce at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or pierceo@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Central Conveyor 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

Mike Fagan Central Conveyor Page 3 November 19, 2024

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Central Conveyor. 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,

Owen Pierce Environmental Engineer Air Quality Division 586-854-3244

Quen Purce

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Kerry Kelly, EGLE