

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY DETROIT



KEITH CREAGH

February 25, 2015

Mr. Frank Chester Vacuum Orna-Metal 11380 Harrison Road Romulus, Michigan 48174

SRN: B4550, Wayne County

Dear Mr. Chester:

## VIOLATION NOTICE

On January 14, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Vacuum Orna-Metal located at 11380 Harrison Road, Romulus, Michigan. The purpose of this inspection was to determine Vacuum Orna-Metal'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 administrative rules and MI-ROP-B4550-2012.

As a result of the inspection, the following violation has been identified:

Process Description	Rule/Permit Condition Violated	Comments
FG-FLOW-COAT	40 CFR Part 63, Subpart PPPP – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products	The facility has not demonstrated compliance with any applicable portion of Subpart PPPP.

FG-FLOW-COAT appears to be subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products. These standards are found in 40 Code of Federal Regulations (CFR) Part 63, Subpart PPPP.

Records indicate that the facility uses 100 gallons per year or more, of coatings that contain Hazardous Air Pollutants (HAPs) and the facility is a major source for HAPs as defined in §63.4481(b). Per §63.4483(b), the compliance deadline for existing sources is April 19, 2007. The facility has not submitted records that demonstrate compliance with the applicable emission limit, and have not submitted any of the following items required under Subpart PPPP: initial notification (§63.4510(b)), notification of compliance status (§63.4510(c)), and semiannual compliance reports (§63.4520(a)).

Mr. Frank Chester Page 2 February 25, 2016

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 17, 2016 (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.

If Vacuum Orna-Metal 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 during my inspection of Vacuum Orna-Metal. 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.

Totad Zynda, P.E. Environmental Engineer Air Quality Division 313-456-2761

cc: Ms. Lynn Fiedler, DEQ Ms. Heidi Hollenbach, DEQ Ms. Teresa Seidel, DEQ Mr. Thomas Hess, DEQ Ms. Wilhemina McLemore, DEQ Mr. Jeff Korniski, DEQ