



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

April 23, 2014

Mr. Todd Campbell
Delta Tube & Fabricating Corporation
4149 Grange Hall Road
Holly, Michigan 48442

SRN: B6488, Oakland County

Dear Mr. Campbell:

VIOLATION NOTICE

On March 19 and 24, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Delta Tube & Fabricating Corporation (Delta) located at 4149 Grange Hall Road, Holly, Michigan. The purpose of this inspection was to determine Delta'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 the conditions of Renewable Operating Permit (ROP) number MI-ROP-B6488-2012.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-METALCOAT MACT	Condition #1.1 of ROP MI-ROP-B6488-2012; 40 CFR 63.3890(b)(1)	Organic Hazardous Air Pollutant (HAP) content of the coating exceeded the specified limit

The conditions of PTI number(s) Condition #1.1 limit the emissions of the Organic HAP to 2.6 lb/gal of coating solids (gacs). The HAP content of the used Laser Blue coating was reported at 4.51 lb/gacs.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 14, 2014 (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 Delta 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 March 19 and 24, 2014. 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,

Handwritten signature of U. Sam Amer in black ink, followed by the word "for" in a simple font.

U. Sam Amer
Senior Environmental Engineer
Air Quality Division
586-753-3734

UA/DC

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ