



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



KEITH CREAGH
DIRECTOR

March 1, 2016

Mr. John McConkie, Plant Technical Manager
IAC Group North American
1964 Williams Rd
Alma, Michigan 48801

SRN: M3582, Gratiot County

Dear Mr. McConkie:

VIOLATION NOTICE

On February 4, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of IAC located at 1964 Williams Road, Alma, Michigan. The purpose of this inspection was to determine IAC'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 Opt-out Permit to Install (PTI) number 170-79H.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating VOC content limit required to be at or below 3.0 lb VOC/gallon (minus water)	FGCOATING2, SC II.1 (Material Limits)	Trace Analytical results for 396W102 Light Camel and 396W24313C Black coatings indicate values of 3.4 and 3.5 lb VOC/gal (minus water), respectively

Trace Analytical in Muskegon, Michigan provided VOC analysis data on February 22 and February 23, 2016, via email. These data indicate that two (2) of the coatings sampled for analysis during the February 4, 2016, inspection exceed their VOC content limit of 3.0 lb/gal (minus water).

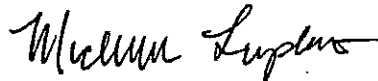
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 22, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the 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 IAC 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 IAC. 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
517-284-6636

cc: Mr. Brad Myott, DEQ

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ