



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
DETROIT



C. HEIDI GREETHER  
DIRECTOR

August 3, 2017

Ms. Patricia Maureen Tanner, Human Resource Director  
Materials Processing, Inc.  
17423 West Jefferson Ave.  
Riverview, MI 48193

SRN: M4586, Wayne County

Dear Ms. Tanner:

**VIOLATION NOTICE**

On March 28, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Materials Processing, Inc. located at 17423 West Jefferson Ave., Riverview, Michigan. The purpose of this inspection was to determine Materials Processing, Inc.'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 Wayne County Permit numbers C-10135 through C10137, C-10545 through C-10547, and C-11054, and Permit to Install (PTI) numbers 193-06 and 149-08.

During the inspection, staff observed the following violations:

Process Description	Rule/Permit Condition Violated	Comments
Coating Line 1	Rule 201(1)	Facility installed two natural gas-fired curing ovens on Line 1 without obtaining a Permit to Install.
Coating Line 1	Wayne County Permit Nos. C-10135 through C-10137, Special Condition 27	VOC emission rates for Line 1 in pounds per gallon, 24-hour averaging period, were not calculated as required.
Coating Line 2	Wayne County Permit Nos. C-10545 through C-10547, Special Condition 20;  Rule 702(a)	VOC emission rate of 16.25 pounds per hour on August 2, 2016, exceeded the permit limit of 4.2 pounds per hour, daily average based on operating hours.
Coating Line 2	Wayne County Permit Nos. C-10545 through C-10547, Special Condition 23;  Rule 702(a)	The VOC content of several coatings used on Line 2 exceeded the permit limits of 0.14 pounds VOC per gallon (minus water) and 0.30 pounds VOC per gallon (minus water).

EU-Coating Line#3	PTI No. 193-06, Special Condition 1.2;  Rule 702(a)	The VOC content of several coatings used on Line 3 exceeded the permit limit of 0.24 pounds VOC per gallon.
Batch Booth 1	Wayne County Permit No. C-11054, Special Condition 17;  Rule 7029(a)	The VOC emission rate on Batch Booth 1 exceeded the permit limit of 1.41 pounds per hour, based on a monthly average, nine times between January 2016 and March 2017.

During the review of records for material usage and emission calculations for the time period January 2016 through March 2017, the following violations were noted:

Wayne County Permit No. C-10135 through C-10137, Special Condition 27: VOC emission rates for Line 1 in pounds per gallon, 24-hour averaging period, were not calculated as required.

Wayne County Permit No. C-10545 through C-10547, Special Condition 20: The VOC emission rate on Line 2 of 16.25 pounds per hour on August 2, 2016, exceeded the permit limit of 4.2 pounds per hour, daily average based on operating hours.

Wayne County Permit No. C-10545 through C-10547, Special Condition 23: Records show that the VOC content of coatings used on Line 2 exceeded the permit limits of 0.14 pounds VOC per gallon (with water) and 0.30 pounds VOC per gallon (minus water), as applied. The following coatings (with VOC content) were used in Line 2 since January 2016: C600A (3 pounds VOC per gallon), Carc (0.43 pounds VOC per gallon), Misc (3.42 pounds VOC per gallon), and Primer (2.85 pounds VOC per gallon).

Permit to Install 193-06, Special Condition 1.2: Records show that the VOC content of coatings used on EU-CoatingLine#3 exceeded the permit limit of 0.24 lb/gallon VOC. The following coatings (with VOC content) were used in Line 3 since January 2016: B18 (5.03 pounds VOC per gallon), C600A (3 pounds VOC per gallon), Carc (0.43 pounds VOC per gallon), Misc (3.42 pounds VOC per gallon), and Primer (2.85 pounds VOC per gallon).

Wayne County Permit No. C-11054, Special Condition 17: Based on emission records, the VOC emission rates for Batch Booth 1 exceeded the permit limit of 1.41 pounds per hour, based on a monthly average, a total of nine times during the compliance period. Specifically, the emission rates were exceeded in January, February, May, June, September, October, November, and December 2016, and in March 2017. The highest average hourly emission rate was 4.57 pounds VOC per hour for September 2016.

Rule 702(a) also states the following:

Rule 702. A person who is responsible for any new source of volatile organic compound emissions shall not cause or allow the emission of volatile organic compound emissions from the new source in excess of the lowest maximum allowing emission rate of the following:

(a) The maximum allowable emission rate listed by the department on its own initiative or based upon the application of the best available control technology.

In addition, during this inspection it was noted that Materials Processing, Inc. had installed two natural gas-fired curing ovens on Coating Line 1 at this facility without first obtaining a Permit to Install. This is a violation of Act 451, Rule 201(1), which states the following:

Rule 201. (1) Except as allowed in R 336.1202, R 336.1277 to R 336.1291, or R 336.2823(15) a person shall not install, construct, reconstruct, relocate, or modify any process or process equipment, including control equipment pertaining thereto, which may emit any of the following, unless a permit to install that authorizes such action is issued by the department.

(a) Any air pollutant regulated by title I of the clean air act and its associated rules, including 40 C.F.R. §51.165 and §51.166, adopted by reference in R 336.1902.

(b) Any air contaminant.

A person who plans to install, construct, reconstruct, relocate, or modify any such process or process equipment shall apply to the department for a permit to install on an application form approved by the department and shall provide the information required in R 336.1203.

A program for compliance may include a completed PTI application for the Coating Line 1 process equipment, including the two natural gas-fired curing ovens. An application form is available by request, or at the following website: [www.michigan.gov/deqair](http://www.michigan.gov/deqair) (in the shaded box on the upper right hand side of the page)

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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 24, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether

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the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Materials Processing, Inc. 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 violations cited above and for the cooperation that was extended to me during my inspection of Materials Processing, Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Jonathan Lamb  
Senior Environmental Quality Analyst  
Air Quality Division  
313-456-4683

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Ms. Wilhemina McLemore, DEQ  
Mr. Jeff Korniski, DEQ