



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

July 20, 2018

Ms. Nancy McInnes  
Bix Furniture Service, Inc.  
27950 Harper Avenue  
St. Clair Shores, MI 48081-1543

SRN: N0465, Macomb (50) County

Dear Ms. McInnes:

**VIOLATION NOTICE**

On July 17, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Bix Furniture Service, Inc. (Bix) located at 27950 Harper Avenue, St. Clair Shores, Michigan. The purpose of this inspection was to determine Bix'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.

During the July 17, 2018, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
5 feet x 10 feet open-top (without lid to close) furniture paint stripper.  Gravity flow solvent drain at one corner. Spent solvent is collected in 5-gallon container for reuse or disposal.	Rule 336.1201 (Permit-to-Install)	Bix installed the paint stripping process without obtaining a Permit-to-Install. The process uses solvents containing 50-100 percent methylene chloride (CAS 75-09-2), aka dichloromethane. Chemosphere Corporation of St. Louis, MO 63139, supplies the stripping solvent.
8 feet x 8 feet paint spray booth / room (24 filter panels).	Rule 336.1910	Dry filter system for paint overspray capture was inadequate. The filters were not installed properly; there were numerous holes and gaps.

This paint (paint, enamel, varnish, shellac, lacquers, etc., from wood, metal, plastic, and other substrates) stripping process is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. These standards are

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found in 40 CFR, Part 63, Subpart HHHHHH (6H). The NESHAP / MACT 6H regulations are published in January 9, 2008, Federal Register (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Page 1738, Federal Register / Vol. 73, No. 6 / Wednesday, January 9, 2008 / Rules and Regulations / Final rule).

For technical information concerning the paint stripping standards, please directly contact Mr. Warren Johnson (Phone: 919-541-5124; E-mail: Johnson.warren@epa.gov) of OAQPS, US EPA, RTP, North Carolina 27711. For questions regarding compliance, please contact Ms. Sara Breneman (Phone: 312-886-6789) of Air Enforcement and Compliance Assurance Branch, Air and Radiation Division AE 17J, Region V, US EPA, 77 West Jackson Boulevard Chicago, Illinois 60604-3590.

AQD has information that non-halogenated paint strippers are available; e.g., Benco #B20 Industrial Paint Remover (Benco, Inc. of Crossville, Tennessee; Phone: 931-484-9578).

During this inspection, it was noted that Bix had installed and commenced operation of an unpermitted methylene chloride (CAS 75-09-2) based paint stripping process at this facility. The AQD staff advised Bix on July 17, 2018 that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for the 5 feet \* 10 feet open-top (without lid to close) furniture paint stripper process equipment. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml#AUP](http://www.deq.state.mi.us/aps/nsr_information.shtml#AUP)

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.

On July 17, 2018, AQD staff observed operation of the paint spray booth while the dry filter system for paint overspray particulate matter capture was malfunctioning due to improper installation of the dry filters.

This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 10, 2018 (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 the violations are ongoing; a summary of the actions that have been taken and are

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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.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald Court, Warren, Michigan 48092-2793 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Bix 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 Bix. 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,



Iranna Konanahalli

Senior Environmental Engineer

Air Quality Division

586-753-3741; konanahalli@michigan.gov

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Joyce Zhu, DEQ