



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

April 13, 2021

Mr. Marvin Hairston
Manager
Spraytek, Inc.
2535 Wolcott Street
Ferndale, MI 48220

SRN: N0917, Oakland County

Dear Mr. Hairston:

VIOLATION NOTICE

On March 30, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Spraytek, Inc. located at 2535 Wolcott Street, Ferndale, Michigan. The purpose of this inspection was to determine Spraytek'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 Permit to Install (PTI) number 143-04C.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--------------------------------|--|
| Batch 2 Spray Booth | Appendix A, 4.a. | The permittee failed to maintain measures necessary to minimize the generation of fugitive VOC emissions. The permittee kept an uncovered 5-quart bucket containing about 1/4" of solvent. |
| Batch 2 Spray Booth | Appendix A, 4.a. | The permittee failed to maintain measures necessary to minimize the generation of fugitive VOC emissions. The permittee kept a 5-gallon pail approximately half-full of waste solvent that was improperly covered with a warped loose-fitting lid. |

| | | |
|---------------------|---|---|
| EULINE2 | PTI No. 143-04C, Special Conditions III.1, III. 3, and Appendix A, 4.a. | The permittee failed to maintain measures necessary to minimize the generation of fugitive VOC emissions. The permittee kept an uncovered 5-gallon bucket with approximately 1/2" of solvent. |
| Batch 1 Spray Booth | Appendix A, 4.a. | The permittee failed to maintain measures necessary to minimize the generation of fugitive VOC emissions. The permittee kept an uncovered paint pot containing residual drying surface coating material that was generating fugitive emissions. |

During this inspection, AQD staff observed that adjacent to Batch 2 Spray Booth, the permittee kept an uncovered 5-quart bucket containing about 1/4" of solvent, and an improperly covered (lose fitting warped lid) 5-gallon pail approximately half-full of waste solvent. This is a violation of Appendix A, 4.a, which states in part, "material containers shall be covered in a manner that minimizes the emission of fugitive emissions and odors during the application process."

During this inspection, AQD staff observed that adjacent to EULINE2, the permittee kept an uncovered 5-gallon bucket with approximately 1/2" of solvent. This is a violation of PTI No. 143-04C, FGCOATING, Special Condition III.1, which states in part, "The permittee shall capture all waste coatings and shall store them in closed containers", and Special Condition III. 3, which states, "The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary." Furthermore, this is a violation of Appendix A, 4.a, which states in part, "material containers shall be covered in a manner that minimizes the emission of fugitive emissions and odors during the application process."

During this inspection, AQD staff observed that adjacent to Batch 1 Spray Booth, the permittee kept an uncovered paint pot containing drying residual surface coating material that was generating fugitive emissions. This is a violation of Appendix A, 4.a,

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which states in part, "material containers shall be covered in a manner that minimizes the emission of fugitive emissions and odors during the application process."

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 4, 2021 (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 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 EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Spraytek 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 March 30, 2021. 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,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Ms. Susan Apczynski, Spraytek