



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

June 2, 2015

Mr. Michael Lentz  
 Quality Assurance Manager  
 Michigan Metal Coating Company  
 2015 Dove Street  
 Port Huron, Michigan 48060

SRN: N0950, St. Clair County

Dear Mr. Lentz:

**VIOLATION NOTICE**

On April 28, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Michigan Metal Coating Company located at 2015 Dove Street, Port Huron, Michigan. The purpose of this inspection was to determine Michigan Metal Coating Company'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 Permits to Install (PTI) number 116-06 and 139-06.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	PTI No. 116-06, SC 8.1a	As of April 2014, facility exceeded the individual Hazardous Air Pollutant (HAP) [Methanol] limit of 9 TPY.
FGFACILITY	40 CFR 63.9(b); 40 CFR 63.3910(b)	Facility failed to submit an initial notification to the Department and the USEPA Region 5 office regarding the applicability of 40 CFR 63, Subpart M-Nation Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products.

Based on the HAP emission calculations performed by MDEQ-AQD, from October 2014, the facility exceeded the Title V major source threshold of 10 TPY for a single HAP defined pursuant to Michigan Administrative Rule R336.1210(1)(a)(i)(A). Per Rule R336.1210(5), a facility which became a major source after the effective date of Michigan Administrative Rule R336.1210, should submit a timely administratively complete Renewable Operating Permit application to the Department within 12 months after the facility became a major source.

Furthermore, based on the HAP emission calculations performed by MDEQ-AQD, from October 2014, the facility exceeded the major source threshold of 10 TPY for a single HAP as defined in 40 CFR 63.3881. Hence the metal coating process at the facility is subject to 40 CFR 63, Subpart M-M-M-M-Nation Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Miscellaneous Metal Parts and Products. The compliance date for this federal standard is one year after the source became a major source.

The facility must submit an initial notification to USEPA Region 5 and to the Department as soon as possible. The information required for the initial notification is specified in 40 CFR 63.9(b) and 40 CFR 63.3910(b).

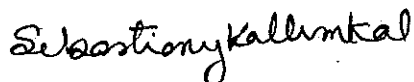
The facility shall submit a "Notification of Compliance Status", as specified in 40 CFR 63.3910, no later than 30 calendar days following the end of the initial compliance period. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.3883 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by **June 23, 2015**. 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 Michigan Metal Coating Company 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 April 28, 2015. 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,



Sebastian G. Kallumkal  
Senior Environmental Engineer  
Air Quality Division  
586-753-3738

SGK/DAC

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ