

STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



May 3, 2019

Mr. Mike Lentz General Manager Michigan Metal Coatings Company 2015 Dove Street Port Huron, MI 48060

Dear Mr. Lentz:

SRN: N0950, St.Clair County

VIOLATION NOTICE

On February 21, 2019, the Michigan Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Michigan Metal Coatings Company located at 2015 Dove Street, Port Huron, Michigan. The purpose of this inspection was to determine Michigan Metal Coatings 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 139-06 and 116-06B.

During the inspection and records review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Natural gas-fired evaporator used to reduce the volume of collected clean- up water (EUWASTEEVAP)	PTI 116-06B, EUWASTEEVAP Special Condition I.1.	Per the VOC emission records for EUWASTEEVAP, as of February 2019, the VOC emissions from wastewater evaporator were 6.65 TPY on a 12-month rolling time period and it exceeded the permit limit of 5.00 TPY.
Five dip-spin coating lines (FGCOATERS)	PTI 116-06B, FGCOATERS Special Condition I.2.	Per the VOC emission records for EUCOATER5, as of February 2019, the daily volume-weighted average of VOC contents of the coatings as applied on a daily basis for EUCOATER5 exceeded the permit limit of 3.5 lb/gal (minus water) on April 2-5, April 7, April 9-13, April 16-21, April 23-27, April 30, May 1-4, May 7-8, May 10-11, May 14-19, May 22-25, and May 29-31, 2018.

A burn-off oven (EUBURNOFF) is used to clean dirty coating baskets.	PTI No. 139-06, Special Condition IV.3	During this inspection, the primary burner temperature was 496 degrees Fahrenheit and the afterburner temperature was 1289 degrees Fahrenheit. This is a violation of
		SC IV.3 because SC IV.3 requires an interlock system that means the primary burner won't start until the secondary burner reaches the minimum temperature of 1400 degrees Fahrenheit. The afterburner temperature started increasing. Meanwhile, the primary burner also started.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 24, 2019 (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 the EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Michigan Metal Coatings 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 violations cited above and for the cooperation that was extended to me during my inspection of Michigan Metal Coatings Company. 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,

Shamim Ahammod
Environmental Engineer
Air Quality Division

586-212-0508 or Ahammods@michigan.gov

cc: Ms. Mary Ann Dolehanty, EGLE Dr. Eduardo Olaguer, EGLE

Mr. Christopher Ethridge, EGLE

Ms. Jenine Camilleri, EGLE

Ms. Joyce Zhu, EGLE