



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 29, 2016

Mr. Jim Grimes
Wright Coating Technologies
1603 North Pitcher Street
Kalamazoo, Michigan 49007

SRN: N0991, Kalamazoo County

Dear Mr. Grimes:

VIOLATION NOTICE

On July 29, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Wright Coating Technologies (Facility), located at 1603 North Pitcher Street, Kalamazoo, Michigan. The purpose of this inspection was to determine the Facility'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) No. 244-85, 246-85A, 247-85A, 681-87B, 690-91, 604-89, 243-85, and 218-01.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Strip Tank	R 336.1290 (Rule 290)	Exceeded the 1000 lb/month of non-carcinogenic volatile organic compound (VOC) limit for exemption during February 2014 (comment 2).
	R 336.1201 (Rule 201)	A PTI is required because Rule 290 conditions for exemption were not met for February 2014 (comment 2).
EULine#5 (coating line)	PTI No. 681-87B, Special Condition Number 18.	Failed to provide records (comment 1).

Comment 1:

During this inspection, the Facility was unable to produce emission records. This is a violation of the recordkeeping and emission limitations specified in Special Condition Number 18 of PTI No. 681-87B.

The conditions of PTI No. 681-87B require coating usage records for metal furniture parts and products, which shall be made available for review upon request by staff of the AQD.

Comment 2:

The records provided demonstrate that emissions of VOCs from the strip tank exceeded the Act 451, Rule 290 limit of 1000 lb/month during the month of February 2014. The Facility is required to be in compliance with this rule in order to be exempt from Rule 201, which requires the issuance of a permit before installation/operation of the process equipment. Because the Facility does not have a PTI for this equipment, the Facility has also violated Rule 201 of Act 451.

A program for compliance may include a completed PTI application for the strip tank process equipment. An application form is available by request, or at the following website: http://www.deq.state.mi.us/aps/nsr_information.shtml

Be advised that Rule 201 of Act 451 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 September 19, 2016 (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.

If the Facility 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 the Facility.

Mr. Jim Grimes
Page 2
August 29, 2016

If you have any questions regarding the violations or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Monica Brothers", with a horizontal line extending to the right.

Monica Brothers
Environmental Quality Analyst
Air Quality Division
269-567-3552

MB:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ