



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

March 8, 2018

Mr. Anthony Aguinaga  
SpaceRAK  
6300 Karen Street  
Marlette, Michigan 48453

SRN: N1203, Sanilac County

Dear Mr. Aguinaga:

**VIOLATION NOTICE**

On March 5, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of SpaceRAK (formerly Eugene Welding Co.) located at 6300 Karen Street, Marlette, Michigan. The purpose of this inspection was to determine SpaceRAK'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 738-85A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Operation: 2 paint spray booths	SC 19, 20, 21	The facility shall keep records for material usage and characteristics and calculate monthly emissions of VOC and HAPs.

During this inspection, SpaceRAK was unable to produce the emission records. This is a violation of the recordkeeping and emission limitations specified in Special Conditions (SC) numbers 19, 20 and 21 of PTI number 738-85A.

The conditions of PTI number 738-85A require the maintenance of material use and characteristic records as well as emission calculation records, which shall be made available for review upon request by AQD staff.

A copy of permit number 738-85A is enclosed.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 29, 2018 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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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.

As part of this response, please review your production records and material safety data sheets (MSDS) to calculate a calendar month VOC emission rate in tons per month, and a 12-month rolling time period total VOC emission rate in tons per month as described in SC 20 of PTI number 738-85A.

Additionally, please review your production records and MSDS to calculate a calendar month individual HAP emission rate in tons per month, a calendar month aggregate HAP emission rate in tons per month, and a 12-month rolling time period total HAP emission rate in tons per month as described in SC 21 of PTI number 738-85A.

To perform these calculations, please review your production records for the past 12 months. To simplify and expedite the calculations, the AQD would accept a "worst case" estimate that utilizes an estimate of total paint used with the paint that contains the highest content of VOC and HAPs.

If SpaceRAK 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 SpaceRAK. 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,



Matthew R. Karl  
Environmental Quality Analyst  
Air Quality Division  
989-439-3779

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