



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

October 19, 2015

Ms. Dawn F. Holbrook
President
AFCO Manufacturing Corporation
P.O. Box 230
428 Cogshall Street
Holly, MI 48442-1756

SRN: N2005, Oakland County

Dear Mr. Holbrook:

VIOLATION NOTICE

On October 2, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of AFCO Manufacturing Corporation (AFCO Manufacturing) located at 428 Cogshall Street, Holly, Michigan. The purpose of this inspection was to determine AFCO Manufacturing'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 Permit to Install (PTI) number 376-88.

During the October 02, 2015, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Primer dip coating process, dip coating tank (12 ft. L * 5 ft. W * 5 ft. H)	PTI No. 376-88, Special Condition (SC) 16: VOC and coatings records	AFCO Manufacturing Corporation (AFCO Manufacturing) failed to keep coating usage records and calculate monthly VOC emissions. MS Excel may be used for the required calculations such that the calculations methods, procedures, format are acceptable to AQD.
Primer dip coating process, dip coating tank (12 ft. L * 5 ft. W * 5 ft. H)	PTI No. 376-88, SC 17: keep dip tank covered at all times	On October 2, 2015, AQD staff observed that AFCO Manufacturing kept the lid open as a matter of practice. Also, the paint was spilled in the vicinity of the dip tank via dripping from the parts being coated (steel pipes).
Paint spray process on the open floor	Rule 336.1201 (Permit-to-Install)	AFCO Manufacturing installed the Spray Painting Process without obtaining a Permit-to-Install prior to commencing the painting operation. The spray painting is done without any booth and without a paint overspray particulate matter control system. ⁶

⁹ Alternatively, AFCO Manufacturing may install a spray coating line that meets all of the Rule 336.1287(c) conditions:

1. The coating use rate is not more than 200 gallons, as applied, minus water, per month.
2. Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
3. Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.

It is not necessary to obtain an air quality permit for spray coating if all of the above conditions are met at all times.

It is not necessary to obtain an air quality permit if powder coating processes, with curing oven(s) of course, replace the above coating lines (dip and spray) pursuant to Rule 336.1287(d) provided the powder booth is equipped with appropriately designed and operated particulate control system. Powder coating systems have almost 100 percent transfer efficiency via recycle and reuse of coating powders resulting in practically nil waste of paint.

During the October 2, 2015, inspection, AFCO Manufacturing was unable to produce emission records, which are required to be kept by PTI No. 376-88, SC 16.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 9, 2015 (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 AFCO Manufacturing 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 AFCO Manufacturing.. 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,



Iranna Konanahalli
Environmental Engineer
Air Quality Division
konanahalli@michigan.gov

IK/DC

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