

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SAGINAW BAY DISTRICT OFFICE

DE

DIRECTOR

June 17, 2016

Mr. Bryan Schindler Kerkau Manufacturing 910 Truman Parkway Bay City, MI 48708

SRN: N2147, Bay County

Dear Mr. Schindler:

VIOLATION NOTICE

On June 14, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Kerkau Manufacturing located at 910 Truman Parkway, Bay City, Michigan. The purpose of this inspection was to determine Kerkau Manufacturing 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 (PTIs) numbers 137-96 and 400-89.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating Operation	PTI 137-96; S.C. 13	Could not verify compliance with emission limits, due to lack of records
Coating Operation	PTI 137-96; S.C. 17.A	Record hours of operation
Coating Operation	PTI 137-96; S.C. 17.B	Record coating used, VOC content per month
Coating Operation	PTI 137-96; S.C. 17.C	Record gallons of cleanup solvent used
Coating Operation	PTI 137-96; S.C. 17.D	Record 12-month rolling VOC emissions

During this inspection, Kerkau Manufacturing was unable to produce emission records.

This is a violation of the recordkeeping and emission limitations specified in Special Condition numbers 17 A thru D of PTI number 137-96. The conditions of PTI number 137-96 require maintenance of records on file of at least two years, which shall be made available for review upon request by the AQD staff.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 8, 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 Kerkau 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 Kerkau 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,

Gina L. McCann

Environmental Quality Analyst

Air Quality Division 989-894-6218

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ

Ms. Heidi Hollenbach, DEQ

Mr. Thomas Hess, DEQ

Mr. Chris Hare, DEQ