



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



C. HEIDI GREYHER  
DIRECTOR

September 21, 2017

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Mark Tomasik  
March Coatings Plant 1  
160 Summit Street  
Brighton, Michigan 48116

SRN: N2497, Livingston County

Dear Mr. Tomasik:

**VIOLATION NOTICE**

On August 25, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of March Coatings Plant 1 located at 160 Summit Street, Brighton. 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) numbers 427-90A, 45-94, 348-01, and 80-03.

During the inspection, staff observed the following:

Violation Number	Process Description	Rule/Permit Condition Violated	Comments
1	EUBURNOFF	PTI 80-03, Special Condition (SC) 1.5	Proof of afterburner satisfactory operation could not be provided.
2	EUBURNOFF	PTI 80-03, SC1.7	Sand bed temperature monitoring prior to part installation not being documented / maintained.
3	EUBURNOFF	PTI 80-03, SC1.8	Automatic temperature control system not installed.
4	EUBURNOFF	PTI 80-03, SC1.9	Interlock system not installed.
5	EUBURNOFF	PTI 80-03, SC1.10	Device to record afterburner temperature is not installed.
6	EUBURNOFF	PTI 80-03, SC1.11	Thermocouple calibration documents could not be located.
7	EUBURNOFF	PTI 80-03, SC1.12	Records unavailable or not being maintained.
8	EUBURNOFF	PTI 80-03, SC1.13	Records unavailable or not being maintained.
9	EUBURNOFF	PTI 80-03, SC1.14	Malfunction records not being maintained.
10	EUBURNOFF	PTI 80-03, SC1.15	Chemical composition records unavailable or not being maintained for materials used in oven.

1. SC1.5 requires the afterburner zone to be installed, maintained, and operated in a satisfactory manner. Satisfactory operation of the afterburner zone includes maintaining a minimum temperature of 1100 degrees F and a minimum retention time of 1.6 seconds. Upon inspection, the device was not operating and records for proof of proper operation were not being maintained.
2. SC1.7 requires the permittee to not operate EUBURNOFF unless the sand bed is preheated to 850 degrees F before parts are loaded into the sand bed for processing. Upon inspection, the device was not operating and records or an operating procedure to be followed by employees was not being maintained or available.
3. SC1.8 requires the permittee to equip and maintain EUBURNOFF with an automatic temperature control system for the furnace. Upon inspection it was found that this device is not installed.
4. SC1.9 requires the permittee to equip and maintain EUBURNOFF with an interlock system that shuts down the furnace when the automatic temperature control system for the furnace is not operating properly. Upon inspection it was found that this device is not installed.
5. SC1.10 requires the permittee to install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record the temperature in the afterburner zone on a continuous basis. Upon inspection it was found that a recording device has never been installed.
6. SC1.11 requires the permittee to calibrate the thermocouples associated with the sand bed and afterburner zone at least once per year. Upon inspection, calibration records could not be provided.
7. SC1.12 requires that all records shall be completed in a format acceptable to the AQD District Supervisor and made available by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any recordkeeping, reporting or notification special condition. As noted in previous violations, records are not being maintained as required.
8. SC1.13 requires the permittee to keep, in a satisfactory manner, continuous temperature data records for the EUBURNOFF afterburner zone for a period of at least five years. Upon inspection these records were not available due to a temperature recording device not being installed.
9. SC1.14 requires the permittee to keep, in a satisfactory manner, records of the date, duration, and description of any malfunction of the control equipment, any maintenance performed and any testing results for EUBURNOFF. All records shall be kept on file for a period of at least five years. Upon inspection it was found that these records are not being maintained.
10. SC1.15 requires the permittee to maintain a current listing from the manufacturer of the chemical composition of each material being removed from the parts being processed in EUBURNOFF. The data may consist of Material Safety Data Sheets, manufacturer's formulation data and shall be kept on file for a period of at least five years. Upon inspection, these records could not be provided.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 12, 2017. 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 address your response as stated below:

Mr. Brad Myott, District Supervisor  
DEQ/AQD, Lansing District Office  
Constitution Hall, 1 South  
525 W. Allegan Street, PO Box 30242  
Lansing, Michigan 48909

If March Coatings Plant 1 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 March Coatings Plant 1. 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,



Nathan Hude  
Environmental Quality Analyst  
Air Quality Division  
517-284-6779

NNH:TG

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