



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

November 15, 2022

VIA E-MAIL AND CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Michelle Byrnes  
Dapco Industries  
2500 Bishop Circle East  
Dexter, MI 48130

SRN: N3267, Washtenaw County

Dear Michelle Byrnes:

**VIOLATION NOTICE**

On November 2, 2022, the Department of Environment, Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted an unannounced compliance inspection of Dapco Industries (Company) located at 2500 Bishop Circle East, Dexter, Michigan. The purpose of this inspection was to determine the Company’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) and the associated Air Pollution Control Rules, and conditions of Permit to Install (PTI) 470-97.

During the inspection and subsequent records review, AQD staff determined the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
1000 Gallon Anhydrous Ammonia Storage Tank	Rule 201	No Permit to Install. Note that distance to the nearest residential home is 250 feet so would not qualify for a General PTI permit.
Vapor Degreaser Room	PTI 470-97, Special Condition 21	40-foot-tall stack required for general ventilation is missing.
Batch Vapor Degreaser Using Methylene Chloride.	40 CFR Part 63 PART 63.463(b)(2)(i)- Subpart T - National Emission Standards for Halogenated Solvent Cleaning.	Room housing vapor degreaser had open bay door to outside and open plastic curtains to rest of plant. Company not maintaining operating conditions followed when required velometer measurements are being taken.
Batch Vapor Degreaser	PTI 470-97, Special Condition 18(1);	Vapor degreaser has no cover.

Batch Vapor Degreaser	PTI 470-97, Special Condition 15	Vapor degreaser is powered off on weekends often with no maintenance occurring.
7 Metal Grinding Machines	Rule 201	No Permit to Install. Seven metal grinding machines that exhaust to a common stack that lack a pre-cleaner/fabric filter are being exhausted outside resulting in roof staining. Permit exemptions don't apply since no control.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 1, 2022. 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 submit written response to the EGLE, AQD Jackson District, at 301 East Louis B Glick Highway, Jackson, Michigan 49201, and submit copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Company 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 recent inspection. 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,



Mike Kovalchick  
Senior Environmental Engineer  
Air Quality Division  
517-416-5025

cc: Scott Miller, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Jeff Rathbun, EGLE