



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

March 26, 2018

Mr. Charlie Adams  
Spectrum Decorative Finishes, Inc.  
13 McConnell Street SW  
Grand Rapids, Michigan 49503

SRN: N6218, Kent County

Dear Mr. Adams:

**VIOLATION NOTICE**

On February 15, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Spectrum Decorative Finishes, Inc. located at 13 McConnell Street, SW, Grand Rapids, Michigan. The purpose of this inspection was to determine Spectrum Decorative Finishes, Inc.'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 277-97C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBASECOAT	Rule 910	Failure to properly install, maintain and operate an air-cleaning device.
EUMAINLINE	PTI No. 277-97C, EUMAINLINE, Special Condition IV.3 Rule 910	The company operated EUMAINLINE without the RTO on November 20, 2017.
EUMAINLINE & FGFACILITY	PTI No. 277-97C, EUMAINLINE, Special Condition V.1	Failure to utilize Method 24 to determine VOC content, water content, and density of any material as applied and as received.

During the inspection, AQD staff observed that the water wash particulate control device for EUBASECOAT was malfunctioning and paint was present on the facility roof.

The AQD recordkeeping and file review indicated that Spectrum Decorative Finishes, Inc. continued to operate the EUMAINLINE solvent coating line uncontrolled after the Regenerative Thermal Oxidizer (RTO) shut down on November 20, 2017. The permit requires that the booths not operate without the RTO installed, maintained and operated properly.

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Both of these issues constitute a separate violation of the permit and Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The permit also requires that federal Reference Test Method 24 be used to determine coating VOC and material content, unless prior approval to use manufacturer's formulation data has been requested. The facility has not requested to use manufacturer's formulation data and is using Safety Data Sheets.

Additionally, the permit provides the AQD with the ability to request verification of capture and destruction efficiency of the RTO. Please consider this a request to conduct testing in accordance with Department requirements. Capture efficiency testing shall be conducted only through coordination with the AQD Technical Programs Unit staff. All testing shall be completed on or before July 6, 2018.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 9, 2018 (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 Spectrum Decorative Finishes, Inc. 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 Spectrum Decorative Finishes, Inc. 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,  
  
April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

cc: Ms. Heidi Hollenbach, DEQ  
cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ  
Mr. Craig Fitzner, DEQ  
Mr. Christopher Ethridge, DEQ  
Mr. Thomas Hess, DEQ