



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 2, 2013

Mr. Richard Wallace, President and Owner
ND Industries, Inc.
1000 North Crooks Road
Clawson, Michigan 48017-1003

SRN: N6577, Oakland (63) County

Dear Mr. Wallace:

VIOLATION NOTICE

On October 24, 2013, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of ND Industries, Inc. located at 1000 North Crooks Road, Clawson, Michigan. The purpose of this inspection was to determine ND Industries' 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 PTI No. 72-99C dated September 5, 2008.

During the October 24, 2013 inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-Coating: Clawson coating facility	PTI No. 72-99C, FG-Coating, Special Condition (SC), Testing, 1.6	ND Industries failed to perform US EPA Reference Method 24 coating analysis by December 2012 for CY2012 ^o
^o PTI No. 72-99C (SC 1.6) together with the Ms. Teresa Seidel's letter dated March 31, 2009, to Mr. Michael Tohlman, that approved US EPA RM 24 coating analyses, require annual coating analyses (minimum 5 frequently used coatings and 5 random coatings) by December 31 of each year.		

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 23, 2013 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If ND Industries 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 violation cited above and for the cooperation that was extended to me during my inspection of ND Industries. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Iranna Konanahalli
Environmental Quality Analyst
Air Quality Division
konanahalli@michigan.gov or 586-753-3741

ISK /DAC

cc: Mr. Michael Tohlman, General Manager, ND Industries, Inc.
Mr. Rob Chraska, EHS Manager, ND Industries, Inc.

cc/via email: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ