



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



DAN WYANT  
DIRECTOR

March 13, 2014

Mr. James Richard  
X-Cel Industries, Inc.  
21121 Telegraph Road  
Southfield, Michigan 48033

SRN: N6594, Oakland County

Dear Mr. Richard:

**VIOLATION NOTICE**

On March 3, 6 and 7, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted inspections of X-Cel Industries Inc. (X-Cel) located at 21121 Telegraph Road, Southfield, Michigan. The purpose of this inspection was to determine X-Cel'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 administrative rules; the conditions of Permit to Install (PTI) number 260-98B and to investigate a reported possible emission exceedance.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUTHierica	PTI no. 260-98B, special condition 1.1b.	Emissions from EUTHierica plastic coating parts exceeded the permit limit of 30.0 tons per year based on a 12-month rolling time period from October 2013 through January 2014.
EUTHierica	PTI no. 260-98B, special condition 1.7 and R 336.1910 of Act 451.	As identified during the inspections on March 6 and 7, 2014, the permittee operated EUTHierica when exhaust filters were not installed and operated in a satisfactory manner.
FGFACILITY	PTI no. 260-98B, special condition 2.1d.	Emissions from FGFACILITY plastic parts coating operations exceeded the permit limit of 30.0 tons per year based on a 12-month rolling time period from October 2013 through January 2014.

The records reviewed and provided during my inspections demonstrate that actual emissions of VOC from the EUTHIERICA and FGFACILITY plastic parts coating operations were greater than 30.0 tons per year based on a 12-month rolling time period from October 2013 through January 2014, which exceeds the permit limit of 30.0 tons per year as specified in PTI no. 260-98B, special conditions 1.1b and 2.1d respectively. The conditions of PTI number 260-98B limit the emissions of VOC to 30.0 tons per year from plastic parts coating operations.

On March 6 and 7, 2014, the AQD staff observed the EUTHIERICA exhaust filters and determined that the installation and operation of some exhaust filters was unsatisfactory because the pocket filters were not properly inserted into the support frame and the routing of a hose through the filter support frame in booth 5 prohibited the proper installation and operation of the control device. The unsatisfactory installation of some filters is in violation of PTI no. 260-98B, special condition 1.7.

The improper installation of filters also constitutes a violation of Act 451, 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 4, 2014. 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 X-Cel 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 violations cited above and for the cooperation that was extended to me during my inspections of March 3, 6 and 7, 2014. 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,



Robert Elmouchi  
Environmental Quality Analyst  
Air Quality Division  
586-753-3736

RE/DC

cc: Mr. Ted Hundich, X-Cel  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ