



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 30, 2021

Mr. Tim Johnson, General Manager
Universal Coating, Inc.
5204 Energy Drive
Flint, Michigan 48505

SRN: N7256, Genesee County

Dear Mr. Johnson:

VIOLATION NOTICE

On August 13, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted a visible observation of Universal Coating located at 5204 Energy Drive, Flint, Michigan. The purpose of this visible observation was to determine 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 Renewable Operating Permit (ROP) number MI-ROP-N7256-2017a.

During the observation, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-BURNOFF	Rule 336.1910/SC IV.2	Improperly installed, maintained and operated secondary chamber or afterburner
EU-BURNOFF	Rule 336.1910/SC IV.3	Interlock system should have prevented the operation of the primary chamber when the secondary chamber or afterburner is not operating properly,

During the observation on August 13, 2021, visible emissions were detected coming from EU-BURNOFF. The observation of visible emissions from a burn off oven indicates that the secondary chamber or afterburner is not properly installed, maintained nor operated in a satisfactory manner as required by EU-BURNOFF Special Condition IV.1 and Rule 336.1910. Photos of the observations were sent to Julie Taylor via email on August 19, 2021. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, 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.

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Furthermore on August 17, 2020, the AQD sent Universal Coating a Violation Notice citing violations discovered as a result of an inspection conducted on date January 23, 2020 and requested your written response by September 8, 2020. A response has been provided by Universal Coating for this violation, but EGLE AQD still considers this previous violation unresolved and an ongoing issue due to the recent observations on August 13, 2021.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 20, 2021, (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.

Please submit the written response to EGLE, AQD, Lansing District, at 525 W. Allegan, First Floor South, Lansing, Michigan 48933 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Universal Coating 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 phone conversation with Julie Taylor on August 18, 2021. 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,



Robert Byrnes
Senior Environmental Engineer
Air Quality Division
517-275-0439

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE