



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

March 28, 2023

VIA E-MAIL AND U.S. MAIL

Jason Nowak, Regional Environmental Manager
The Crown Group - Shelby Plant
12020 Shelby Technical Drive
Shelby Township, Michigan 48315

SRN: N7426, Macomb County

Dear Jason Nowak:

VIOLATION NOTICE

On March 2, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of The Crown Group - Shelby Plant located at 12020 Shelby Technical Drive, Shelby Township, Michigan. The purpose of this inspection was to determine The Crown Group'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 187-18.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBURNOFF	SC VI.1 and 3	The Crown Group failed to maintain temperature data records in a satisfactory manner. Temperature data records requested during the inspection in June 2022 were found to be corrupt. Additionally, records were found to be corrupt for several months from 2021 through 2023. The Crown Group was given time to send the data logger to the manufacturer in an attempt to retrieve the requested data, however this attempt was unsuccessful.

E-Coat coating	Rule 201	The facility had previously operated under the Rule 290 exemption for their E-Coat coating. Upon further review of the ingredients listed in the Safety Data Sheet (SDS) for their E-Coat coating, there is an ingredient (bis(2-(2-butoxyethoxy) methane) whose estimated emissions, based on the lowest recorded E-Coat monthly usage from 2021-2023, exceed the 20 lbs/month limit stated in Rule 290(2)(a)(ii)(a). Thus, the E-Coat process is no longer exempt and is in violation of Rule 201.
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During this inspection, The Crown Group was unable to produce the requested temperature data records. This is a violation of the monitoring and recordkeeping requirements specified in Special Condition SC VI.1 and 3 of PTI number 187-18.

The conditions of PTI number 187-18 require temperature data records for the secondary chamber, or afterburner portion of the EUBURNOFF, to be recorded at least once every 15 minutes and be kept in a satisfactory manner, in a format acceptable to the AQD Supervisor, and made available to the Department upon request.

The facility had previously operated under the Rule 290 exemption for their E-Coat coating. Upon further review of the ingredients listed in the SDS for their E-Coat coating, there is an ingredient (bis(2-(2-butoxyethoxy) methane) whose estimated emissions, based on the lowest recorded E-Coat monthly usage from 2021-2023, exceed the 20 lbs/month limit stated in Rule 290(2)(a)(ii)(a). Thus, the E-Coat process is no longer exempt and is in violation of Rule 201. The AQD staff advised The Crown Group on March 28, 2023, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the E-Coat coating process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 18, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the

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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 the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If The Crown Group 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 The Crown Group. 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,



Owen Pierce
Environmental Engineer
Air Quality Division
586-854-3244

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE