



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 SOUTHEAST MICHIGAN DISTRICT OFFICE



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

April 1, 2015

Mr. Donald Megie, President  
 Mod Interiors, Inc.  
 9301 Marine City Highway  
 Ira Township, MI 48023

SRN: N7499, St. Clair County

Dear Mr. Megie:

**VIOLATION NOTICE**

On March 16, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of your facility located at 9301 Marine City Highway, Ira Township, Michigan. The purpose of this inspection was to determine your facility'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); and the administrative rules.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
3 Spray Coating Processes and 2 Adhesive Coating Processes	DEQ-AQD Administrative Rule R 336.1201 (Rule 201)	Installing and operating processes without first obtaining a permit to install.
3 Spray Coating Processes and 2 Adhesive Coating Processes	DEQ-AQD Administrative Rule R 336.1210 (Rule 210)	No enforceable restrictions to limit the potential to emit of any single Hazardous Air Pollutant (HAP) or combined HAPs to less than 10 tpy and less than 25 tpy respectively. Thus the facility is in violation of operating without a Renewable Operating Permit (ROP).

During the AQD staff inspection, the facility was unable to produce monthly coating use records to show compliance with DEQ-AQD Administrative Rule R 336.1287(c). This is the permit to install exemption requirement for coating 200 gallons or less per month per coating booth. The facility also failed to show records that the application rate on each of the 2 adhesive coating lines is less than 2 gallons per day to meet the DEQ-AQD Administrative Rule R 336.1287(a) permit to install exemption requirement. As such, the above processes were noncompliant with Rule 201 for installing and operating the coating processes without first obtaining a permit to install.

A program for compliance may include a completed PTI application for the paint spray and adhesive coating processes. An application form is available by request, or at the following website:

[http://www.deq.state.mi.us/aps/nsr\\_information.shtml](http://www.deq.state.mi.us/aps/nsr_information.shtml)

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.

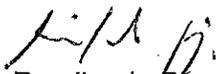
The facility has a total of 3 paint coating lines and 2 adhesive coating lines. Since the facility does not have a permit to install with Federally enforceable conditions to restrict the facility's potential to emit of any single Hazardous Air Pollutant (HAP) to less than 10 tons per year (tpy) or the combined HAPs to less than 25 tpy, the facility is potentially subject to the Renewable Operating Permit (ROP) program as required by the Title V of the Clean Air Act of 1990. DEQ-AQD Administrative Rule R 336.1210, pursuant to R 336.1211(a), prohibits a facility, subject to the ROP program, from operating any emission units without first obtaining a renewable operating permit or has submitted to AQD a timely and administratively complete application for a renewable operating permit. As such, the facility is noncompliant with Rule 210 at this time.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 22, 2015 (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 the facility 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 your facility. 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,



Remilando Pinga  
Senior Environmental Engineer  
Air Quality Division  
586-753-3744

RP/DC

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Christopher Ethridge, DEQ