



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



KEITH CREAGH
DIRECTOR

April 14, 2016

Mr. Rich Parzuchowski
Assistant Plant Manager
Watson Engineering Inc.
16455 Racho Road
Taylor, Michigan 48180

SRN:N7622, Wayne County

Dear Mr. Parzuchowski:

VIOLATION NOTICE

On March 17, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Watson Engineering Inc. (Watson Engineering) located at 16455 Racho Road, Taylor, Michigan. The purpose of this inspection was to determine Watson Engineering'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 and Permit to Install (PTI) number 174-06.

Following the inspection and review of required records, the AQD has identified the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBURNOFF	PTI 174-06, EUBURNOFF, Special Condition 1.10	The device used to continuously monitor the temperature of the afterburner was not operated and maintained in a satisfactory manner. The 24 hour temperature chart was not replaced on a regular basis.
	PTI 174-06, EUBURNOFF, Special Condition 1.11	Yearly calibration records of the thermocouples were not available.
	PTI 174-06, EUBURNOFF, Special Condition 1.12	The 24 hour temperature chart was not replaced on a regular basis.
	PTI 174-06, EUBURNOFF, Special Condition 1.15	Records of the date and duration of each burnoff cycle, coating type removed during each cycle, and daily, monthly, and 12 month calendar year totals of hours of operation were not available.

Mr. Rich Parzuchowski

Page 2

April 14, 2016

PTI 174-06, Special Condition (S.C.) 1.10 requires that the permittee shall install, calibrate, maintain, and operate, in a satisfactory manner, a device to record the afterburner temperature at least once every 15 minutes. S.C. 1.12 also requires afterburner temperature records to be kept in a satisfactory manner. While the recording device was in place, it appears that the 24 hour temperature chart was not replaced since the oven was installed in 2006. This is a failure to maintain and operate the recording device and the associated temperature records in a satisfactory manner.

PTI 174-06, S.C. 1.11 requires that the permittee shall calibrate the thermocouples associated with the primary and secondary chamber at least once per year. No records of this activity were available.

PTI 174-06, S.C. 1.15 requires that the permittee keep records of the operation of EUBURNOFF on a monthly basis including the date and duration of each burn off oven cycle, identification of coating type removed during each cycle, and the daily, monthly, and 12 month calendar year totals of hours of operation of EUBURNOFF. No records of these activities were available.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 5, 2016 (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 Watson Engineering 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.

Mr. Rich Parzuchowski
Page 3
April 14, 2016

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Watson Engineering. 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,

A handwritten signature in black ink that reads "Katie Koster". The signature is written in a cursive, flowing style.

Katie Koster
Senior Environmental Engineer
Air Quality Division
313-456-4678

cc: Ms. Lynn Fiedler, DEQ
Ms. Heidi Hollenbach, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ