



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



DAN WYANT  
DIRECTOR

May 1, 2014

**CERTIFIED MAIL – 7009 2250 0001 1744 4992**  
**RETURN RECEIPT REQUESTED**

Mr. Patrick Ferguson  
VENTOWER Industries, LLC  
111 Borchert Park Drive  
Monroe, Michigan 48161

SRN: P0073, Monroe County

Dear Mr. Ferguson:

**VIOLATION NOTICE**

On February 27, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of VENTOWER Industries, LLC. (VenTower) located at 111 Borchert Park Drive, Monroe, Michigan. The purpose of this inspection was to determine VenTower'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 the conditions of Permit to Install (PTI) number 52-10.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-PBs: consists of EUPB01 and EUPB02	PTI No. 52-10, Condition II. 2.	Exceeded volatile organic compound (VOC) limit of 2.5 lb/gal (minus water) as applied for each <b>Basecoat</b> coating used on each emission unit portion of FG-PBs.
FG-PBs: consists of EUPB01 and EUPB02	PTI No. 52-10, Condition II. 3.	Exceeded VOC limit of 2.5 lb/gal (minus water) as applied for each <b>Topcoat</b> coating used on each emission unit portion of FG-PBs.

The conditions of PTI number 52-10 limit the material VOCs in pounds per gallon (lb/gal) minus water (including compounds used as organic solvents and excluded from the definition of VOC). Coatings are identified as Primer, Basecoat, and Topcoat. VenTower's records and Material Safety Data Sheets obtained during the inspection indicate the coating VOC content of the Basecoat (2.67 lb/gal) and Topcoat (3.25 lb/gal)

used in FG-PBs both exceed their allowed coating VOC content limit of 2.5 lb/gal (minus water and exempt solvents) as applied.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 21, 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 VenTower 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 VenTower. 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,



Diane Kavanaugh Vetort  
Senior Environmental Quality Analyst  
Air Quality Division  
517-780-7864

Enclosure(s)

cc: Mr. Scott Miller, DEQ  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ