



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 25, 2020

Mr. Siva Masetty
Pratt Industries, Inc.
2070 South 3rd Street
Niles, MI 49120

SRN: P0491, Berrien County

Dear Mr. Masetty:

VIOLATION NOTICE

On August 21, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Pratt Industries, Inc. located at 2070 South 3rd Street, Niles, Michigan. The purpose of this inspection was to determine Pratt Industries, Inc. 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 General Permit to Install (GPTI) number 2-14.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-Coating	Special Conditions I.1, I.2, VI.1.d, and VI.1.e of General PTI No. 2-14	Monthly and 12-Month Rolling VOC Emission Records weren't being kept for any of the coating lines to indicate continuous compliance with the 2,000 pound per month and 10 ton per year 12-month Rolling Limits. The data staff was able to review either through MAERS Reports and/or through follow up with the company indicated emissions exceedences of the 10 ton per year limit for a couple of the individual coating lines.
FG-Coating	Special Condition III.1 of General PTI No. 2-14	Staff observed numerous 5-gallon bucket in several paint booths that contained paint waste and/or spent purge solvent that were not in use and left uncovered.
FG-Source	Special Condition I.1 of General PTI No. 2-14	Monthly and 12-Month Rolling VOC Emission Records weren't being kept to indicate continuous compliance with the 30 ton per year source wide limit. A MAERS Report review of data they submitted in 2019 for the 2018 Calendar Year indicated that they have exceeded this limit.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 18, 2020. 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.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Pratt Industries, Inc. 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 Pratt Industries, Inc. 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 "Matt Deskins". The signature is written in a cursive, slightly slanted style.

Matt Deskins
Environmental Quality Analyst
Air Quality Division
269-303-8326

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