



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
DETROIT



C. HEIDI GREETHER
DIRECTOR

May 10, 2017

Mr. Rich Kenger
Advance Engineering Company
7505 Baron Drive
Canton, MI 48187

SRN: P0687, Wayne County

Dear Mr. Kenger:

VIOLATION NOTICE

On March 22, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Advance Engineering Company located at 7505 Baron Drive, Canton, Michigan. The purpose of this inspection was to determine Advance Engineering Company'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 (No.) 64-16.

During the inspection and after the review of the records for year 2016, staff observed the following:

Process Description	Permit Condition Violated	Comments
Parts Cleaner Operations (FGFACILITY)	PTI No. 64-16, Special Conditions (SC) VI.1, VI.2.d, and VI.2.e	VOC emissions rate calculations in tons per month and tons per year were not available for AQD review.

Advance Engineering Company was unable to provide the required monthly calculations in a format acceptable to AQD for review and evaluation. This is a violation of the monitoring and recordkeeping condition specified in SC VI.1 of PTI No. 64-16.

In addition, Advance Engineering Company is in violation of the monitoring and recordkeeping conditions specified in SC VI.2.d, and VI.2.e of PTI No. 64-16 which require keeping the following information in a monthly basis for FGFACILITY:

VI.2.d. VOC emission calculations determining the monthly emission rate of each in tons per calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor.

VI.2.e. VOC emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of

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each calendar month using mass balance or an alternate method acceptable to the AQD District Supervisor. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11-month period immediately preceding the issuance date. For each month thereafter, calculations shall include the summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

Due to inadequate recordkeeping and the lack of acceptable calculations, AQD was unable to determine compliance with the VOC emission limits and the material limits specified in SC I.1 and II.1 of PTI No. 64-16.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 31, 2017 (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 Advance Engineering Company 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 Advance Engineering Company. 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,



Nazaret Sandoval
Environmental Engineer
Air Quality Division
313 456-4680

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Wilhemina McLemore, DEQ
Mr. Jeff Korniski, DEQ