



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 3, 2016

Mr. John A. Chase
Poltrona Frau Group
2655 Product Drive
Rochester Hills, Michigan 48309

SRN: P0721, Oakland County

Dear Mr. Chase:

VIOLATION NOTICE

On July 13, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Poltrona Frau Group located at 2655 Product Drive, Rochester Hills, Michigan. The purpose of this inspection was to determine Poltrona Frau Group'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.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Adhesive application in lines SB1 and SB2 as well as the robotic spray line.	R 336.1201	Poltrona Frau Group installed three adhesive spray booths prior to obtaining permit to install (PTI). Also Poltrona Frau Group did not have proper records of the amount of adhesive used per month readily available to AQD district staff and the exhaust filters for the booths were not working properly.

During this inspection, it was noted that Poltrona Frau Group had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Poltrona Frau Group on 7/13/2016, that this is a violation of Act 451, Rule 201.

A program for compliance may include a completed PTI application for all three adhesive application lines. An application form is available by request, or at the following website:

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.

Alternatively, these processes may be exempt under Michigan Air Pollution Control Rule, **R336.1287(c)** which states, in part:

- R 336.1287 Permit to install exemptions; surface coating equipment.

Rule 287. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

- . . . (c) A surface coating line if all of the following conditions are met:
 - (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
 - (ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.
 - (iii) Monthly coating use records are maintained on file for the most recent two-year period and are made available to the air quality division upon request.

If Poltrona Frau Company chooses to use this exemption, the company must keep **usage** records to demonstrate **each** line is below the monthly usage limit.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for volatile organic compounds (VOC), and single and aggregate hazardous air pollutants (HAP) emissions at the source. This includes but is not limited to the adhesive, including the activator as well as the acetone cleaning booth. Information on calculating PTE can be found at the following website. If Poltrona Frau chooses the permit exemption **R 336.1287(c)**, the material usage limit of 200 gallons per month per spray booth can be used for the potential to emit calculation.

<http://www.michigan.gov//deq/0,4561,7-135-3310---,00.html>

During the July 13, 2016 inspection AQD staff also observed the operation of a hand sprayed adhesive line with the filtration system not properly functioning. The filters were not properly/adequately controlling particulate emissions, and this is evident based on the fugitive adhesive build up on the conical rain cap. This could potentially result in a nuisance situation if the adhesive fallout were to impact any surrounding properties, per **R336.1901** which states, in part:

- R 336.1901 Air contaminant or water vapor; prohibition.

Rule 901. Notwithstanding the provisions of any other rule, a person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:

- (a) Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.
- (b) Unreasonable interference with the comfortable enjoyment of life and property.

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Please describe what measures the company plans to take to prevent additional adhesive from venting out of the associated exhaust stack.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 24, 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 Poltrona Frau Group 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 Poltrona Frau Group. 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,



Tyler Salamasick
Environmental Quality Analyst
Air Quality Division
586-753-3842

cc: Ms. Lynn Fiedler, DEQ
Ms. Teresa Seidel, DEQ
Ms. Heidi Hollenbach, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Ethridge, DEQ