



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

February 27, 2019

Mr. Leon Kresek  
Facilities Manager  
Paslin Company  
25303 Ryan Road  
Warren, MI 48091

SRN: P0739, Macomb County

Dear Mr. Kresek:

**VIOLATION NOTICE**

On January 10, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Paslin Company located at 25303 Ryan Road, Warren, Michigan. The purpose of this inspection was to determine Paslin 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 201-16 and 153-16.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Monitoring/Recordkeeping	PTI 201-16, Section VI. 3b	The facility did not record the VOC content in pounds per gallon of each purge/clean-up solvent used per month.
Monitoring/Recordkeeping	PTI 201-16, Section VI. 3c	The facility did not record the gallons of each purge/clean-up solvent used per month.
Monitoring/Recordkeeping	PTI 201-16, Section VI. 3d	The facility did not properly record the VOC monthly emission rate in tons for each coating line which is to include all purge/clean-up materials used.

Monitoring/Recordkeeping	PTI 201-16, Section VI. 3e	The facility did not properly record the VOC emission rate in tons per 12-month rolling time period for each coating line which is to include all purge/clean-up materials used.
Monitoring/Recordkeeping	PTI 201-16, Section VI. 4 PTI 153-16, Section VI. 2	The facility did not maintain a current listing from the manufacture of the chemical composition of each coating, including the weight of each component.
Monitoring/Recordkeeping	PTI 153-16, Section VI. 3a	The facility did not record the gallons or pounds of each HAP purge/clean-up material used each month.
Monitoring/Recordkeeping	PTI 153-16, Section VI. 3c	The facility did not record the HAP content in pounds per gallon of each HAP purge/clean-up material used each month.
Monitoring/Recordkeeping	PTI 153-16, Section VI. 3d	The facility did not properly record the HAP individual and aggregate emission rate in tons per month for each coating line which is to include all purge/clean-up materials used.
Monitoring/Recordkeeping	PTI 153-16, Section VI. 3e	The facility did not properly record the HAP individual and aggregate emission rate in tons per 12-month rolling time period for each coating line which is to include all purge/clean-up materials used.

During this inspection, Paslin Company was unable to produce purge/clean-up usage records.

This is a violation of (the recordkeeping and emission limitations) specified in Special Condition VI. 3b,c of PTI number 201-16 and Special Condition VI. 3a,c of PTI number 153-16.

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The conditions of PTI number 201-16 and 153-16 require usage records shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 20, 2019 (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.

Please submit the written response to the DEQ, AQD, Southeast Michigan District, at 27700 Donald, Court, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Paslin 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 Paslin 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,



Robert Joseph  
Environmental Engineer  
Air Quality Division  
586-506-9564

cc: Ms. Mary Ann Dolehanty, DEQ  
Dr. Eduardo Olaguer, DEQ  
Mr. Christopher Ethridge, DEQ  
Ms. Jenine Camilleri, DEQ  
Ms. Joyce Zhu, DEQ