



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 31, 2021

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

SRN: P0739, Macomb County

Dear Mr. Kresek:

VIOLATION NOTICE

On January 27, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of The Paslin Company located at 25411 Ryan Road, Warren, Michigan. The purpose of this inspection was to determine The 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; the conditions of Permit to Install (PTI) number 153-16 and General Coating Line permit number 201-16.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Emission Limits: Each coating line plus purge and clean-up operations.	General Coating Line Permit 201-16, FG-COATING Section I.1	It could not be determined if the VOC emission limit was exceeded since the facility did not properly maintain monthly purge and clean-up materials usage, therefore, purchase invoices for 2019 and 2020 were used to determine this which indicated the VOC emission limit was exceeded each year.
Monitoring/Recordkeeping: One or more coating lines and all associated purge and clean-up operations.	General Coating Line Permit 201-16, FG-COATING Section VI. 3c	The facility did not record the gallons of each purge/clean-up solvent used per month.

<p>Monitoring/Recordkeeping: One or more coating lines and all associated purge and clean-up operations.</p>	<p>General Coating Line Permit 201-16, FG-COATING Section VI. 3d</p>	<p>The facility did not properly record the VOC monthly mass emission rate in tons for each coating line which is to include all purge/cleanup materials used.</p>
<p>Monitoring/Recordkeeping: One or more coating lines and all associated purge and clean-up operations.</p>	<p>General Coating Line Permit 201-16, FG-COATING Section VI. 3e</p>	<p>The facility did not properly record the VOC monthly mass emission rate in tons to determine the annual emission rate for each coating line per 12-month rolling time period which is to include all purge/clean-up materials used.</p>
<p>Monitoring/Recordkeeping: One or more coating lines and all associated purge and clean-up operations.</p>	<p>General Coating Line Permit 201-16, FG-SOURCE Section VI. 1</p>	<p>The facility did not properly record the VOC monthly mass emission rate in tons to determine the annual emission rate for all coating lines per 12-month rolling time period which is to include all purge/clean-up materials used.</p>
<p>Monitoring/Recordkeeping: All process equipment source-wide including equipment covered by other permits, grandfathered and exempt.</p>	<p>PTI 153-16, FG-FACILITY Section VI. 3a</p>	<p>The facility did not record the gallons or pounds of each HAP purge/clean-up material used each month.</p>
<p>Monitoring/Recordkeeping: All process equipment source-wide including equipment covered by other permits, grandfathered and exempt.</p>	<p>PTI 153-16, FG-FACILITY Section VI. 3d</p>	<p>The facility did not properly record the monthly individual and aggregate HAP emission rate in tons which is to include all purge/clean- up materials used.</p>
<p>Monitoring/Recordkeeping: All process equipment source-wide including equipment covered by other permits, grandfathered and exempt.</p>	<p>PTI 153-16, FG-FACILITY Section VI. 3e</p>	<p>The facility did not properly record the monthly individual and aggregate HAP emission in tons to determine the annual emission rate per 12-month rolling time period which is to include all purge/clean-up materials used.</p>

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During this inspection, The Paslin Company was unable to produce monthly purge/clean-up material usage records, and accurate monthly and 12-month rolling VOC emission calculations as required in FG-COATING Special Conditions I.1 and VI.3 (c, d, e), and FG-SOURCE Special Condition VI.1 of the General Coating Line permit 201-16, and FG-FACILITY Special Condition VI.3 (a, d, e) of PTI number 153-16.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 21, 2021 (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 EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If The 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 The 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, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE