



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

January 9, 2018

Mr. Rusty McKellar, General Manager
Cadillac Fabrication
1340 Marty Paul Street
Cadillac, Michigan 49601

SRN: U831800021, Wexford County

Dear Mr. McKellar:

VIOLATION NOTICE

On November 29, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Cadillac Fabrication located at 1340 Marty Paul Str., Cadillac, Michigan. The purpose of this inspection was to determine Cadillac Fabrication'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 to investigate a recent complaint which we received on October 23, 2017, regarding outdoor painting and disposal of paint on the ground attributed to Cadillac Fabrication's operations.

At the time of the inspection there was no evidence to substantiate the anonymous complaint regarding painting outside the Cadillac Fabrication building.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Paint Booth	R 336.1201	Unpermitted coating line, records inadequate to demonstrate exemption.

During this inspection, it was noted that Cadillac Fabrication had installed and commenced operation of an unpermitted process at this facility. The AQD staff advised Cadillac Fabrication on November 29, 2017, that this is a violation of Act 451, Rule 201 unless one of the Rule 201 exemptions were met.

Following the inspection, information regarding the permit requirements and exemptions was provided to Cadillac Fabrication and additional information was requested. The purchase records that were provided by Cadillac Fabrication indicate that monthly coating usage may have exceeded the 200 gallons per month limit (coating purchases were greater than 200 gallons for several months). At the time of the inspection Cadillac Fabrication was not maintaining daily or monthly usage records sufficient to demonstrate compliance with the Rule 201 permit exemptions (specifically, R 336.1287(c)).

A program for compliance may include a completed PTI application for the paint booth process equipment. An application form is available at the following website: www.michigan.gov/deqair. There is link to the *Permit to Install (PTI) Application Form* in the upper right hand shaded box. Cadillac Fabrication's operations may be eligible for a General Permit to Install for coating lines emitting up to ten tons per year of Volatile Organic Compounds (VOC). Information on this General Permit can be found here: <http://www.michigan.gov/deq/0,4561,7-135-3310-389804--,00.html> , or by going to the www.michigan.gov/deqair webpage, clicking on the Tab labeled for *Permits*, then *Permits to Install (PTI) / New Source Review (NSR)*, then under Forms, Instructions & Procedures click on the link for *General Permits to Install*. This web page will give all kinds of information about the permit, the program, and sources that qualify for this permit.

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.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 30, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Cadillac Fabrication 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 violation cited above and for the cooperation that was extended to me during my inspection of Cadillac Fabrication. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Kurt Childs
Senior Environmental Quality Analyst
Air Quality Division
231-878-2045

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, Field Operations Section, DEQ
Mr. Thomas Hess, DEQ
Mr. Shane Nixon, DEQ