



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

November 22, 2019

Mr. Erik Klimek  
Expert Coating Company Inc.  
2855 Marlin Court NW  
Grand Rapids, Michigan 49534

SRN: A2722, Kent County

Dear Mr. Klimek:

**VIOLATION NOTICE**

On November 7, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Expert Coating Company Inc., located at 2855 Marlin Court NW, Grand Rapids, Michigan. The purpose of this inspection was to determine Expert Coating Company Inc.'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 317-74A and Consent Order AQD number 2-2015.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBURNOFF	PTI No. 317-74A, EUBURNOFF, Special Condition (SC) IV.1 and Consent Order AQD No. 2-2015, paragraph 9.c	Afterburner temperature below 1,400°F during operation of primary chamber oven.
EUBURNOFF	PTI No. 317-74A, EUBURNOFF, SC VI.2	Incomplete temperature records for each batch.

At the time of the inspection, EUBURNOFF was in operation with the afterburner operating at less than the required minimum 1400°F temperature. This is a violation of PTI No. 317-74A, EUBURNOFF, SC IV.1.

Temperature records reviewed on site from September 2018 through the present showed that Expert Coating Company Inc. was not adequately recording temperature readings three times per batch processed as required. This is a violation of PTI No. 317-74A, EUBURNOFF, SC VI.2.

The cited (PTI number 317-74A, SC IV.1) is also enforceable as paragraph 9.c of Consent Order, AQD number 2-2015.

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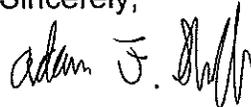
Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 13, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of 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 EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Expert Coating Company Inc. 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 Expert Coating Company Inc. 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,



Adam Shaffer  
Environmental Quality Analyst  
Air Quality Division  
616-970-9077

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE