



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 25, 2021

Mr. Jim Grimes
Wright Coating Technologies
1603 North Pitcher Street
Kalamazoo, Michigan 49007

SRN: N0991, Kalamazoo County

Dear Mr. Grimes:

VIOLATION NOTICE

On May 25, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Wright Coating Technologies located at 1603 North Pitcher Street, Kalamazoo, Michigan. The purpose of this inspection was to determine the facility'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 212-16.

Following the inspection, an inspector from the Materials Management Division (MMD) informed the Air Quality Division that Wright Coating Technologies was disposing of their spent coating booth filters by incinerating them in their burn-off ovens. Wright Coating Technologies indicated in the facility's response to MMD that upon further assessment the filters were determined to be a hazardous waste. Because the facility had been burning hazardous waste in their burn-off ovens, they became subject to 40 CFR Part 63, Subpart EEE - National Emissions Standards for Hazardous Air Pollutants from Hazardous Waste Combustors. The facility was subsequently also required to obtain a Renewable Operating Permit (ROP) under the Title V program. The facility did not comply with the requirements of 40 CFR Part 63, Subpart EEE and did not apply for an ROP. The associated violations are outlined in the following table.

Process Description	Rule/Permit Condition Violated	Comments
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	40 CFR 63.1206(c)(2)	Facility did not submit a Startup Shutdown Malfunction Plan.
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	40 CFR 63.1206(c)(6)	Facility did not develop and implement a training program for certified operators.

Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	40 CFR 63.1206(c)(7)	Facility did not develop an Operation and Maintenance Plan.
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	40 CFR 63.1206(c)(9)	Facility did not install a Particulate Matter Detection System (PMDS).
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	40 CFR 63.1207	Facility has not conducted required performance testing.
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	40 CFR 63.1209	Facility has not installed a Continuous Emissions Monitoring device (CEMS).
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	40 CFR 63.1210	Facility has not submitted notification that they are subject to 40 CFR Part 63, Subpart EEE or notification of compliance.
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	40 CFR 63.1211	Facility has not been reporting or keeping records associated with 40 CFR Part 63, Subpart EEE.
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	R 336.1210(5)(d)	Facility failed to apply for a Renewable Operating Permit (ROP) within twelve months of becoming subject to 40 CFR Part 63, Subpart EEE.
Burn-off Ovens (Pacific Kiln #500 and Steelman Furnace)	R 336.1211(1)(g)(ii)	Facility failed to obtain and operate in compliance with and ROP.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 15, 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.

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Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Wright Coating Technologies 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 facility. 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,

Monica Brothers

Monica Brothers
Senior Environmental Quality Analyst
Air Quality Division
269-312-2535

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE
Mr. Fred Sellers, EGLE