



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

August 17, 2020

Mr. Tim Johnson, General Manager  
Universal Coating Inc.  
5204 Energy Drive  
Flint, Michigan 48505

SRN: N7256, Genesee County

Dear Mr. Johnson:

**VIOLATION NOTICE**

On January 23, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Universal Coating Inc. located at 5204 Energy Drive, Flint, Michigan. The purpose of this inspection was to determine 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 Renewable Operating Permit (ROP) number MI-ROP-N7256-2017a;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-BURNOFF	Rules 336.1224, 336.1225, 336.1301 and 336.1910/SC IV.1	Failure to maintain a minimum of 1400 degrees Fahrenheit in the secondary chamber or afterburner.
EU-BURNOFF	Rule 336.1213(3)(c)(ii)/SC VII.2	Failure to report semi-annual deviations for not meeting minimum temperature requirements
EU-BURNOFF	Rule 336.1213(4)(c)/SC VII.3	Failure to report annual deviations for not meeting minimum temperature requirements

During this inspection, Universal Coating Inc., was unable to produce temperature records demonstrating that the EU-BURNOFF secondary chamber/afterburner was operated a minimum of 1400 degrees Fahrenheit.

Mr. Tim Johnson  
Universal Coating, Inc.  
Page 2  
August 17, 2020

This is a violation of the recordkeeping specified in Special Condition IV.1 of EU-BURNOFF of ROP number MI-ROP-N7256-2017a.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 8, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the temperature deviations occurred; an explanation of the causes and duration of the temperature deviations; whether the temperature deviations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the temperature deviations 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, Lansing District, at 525 W. Allegan, First Floor South Lansing, Michigan 48933 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Universal Coating 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 violation cited above and for the cooperation that was extended to me during my inspection of January 23, 2020. 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,



Robert Byrnes  
Senior Environmental Engineer  
Air Quality Division  
517-275-0439

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