



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SOUTHEAST MICHIGAN DISTRICT OFFICE



KEITH CREAGH  
DIRECTOR

January 8, 2016

Mr. Don Stumpf  
Director of Quality  
Eteron Incorporated  
23944 Freeway Park Drive  
Farmington Hills, Michigan 48335

SRN: P0293, Oakland County

Dear Mr. Stumpf:

**VIOLATION NOTICE**

On December 15, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Eteron Incorporated located at 23944 Freeway Park Drive, Farmington Hills, Michigan. The purpose of this inspection was to determine Eteron Incorporated'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 administrative rules and the conditions of Permit to Install (PTI) number 9-12 and PTI No. 90-14A and Consent Order AQD No. 13-2015.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOATLINE	Consent Order AQD No. 13-2015, Condition No. 9A-2	Facility failed to submit an administratively complete ROP application within 45 days of the issuance of PTI No. 90-14A.
EUCOATLINE	Consent Order AQD No. 13-2015, Condition No. 9B	Facility failed to submit Notification of Compliance Status to the USEPA Region 5 pursuant to NESHAP for Surface Coating of Plastic Parts and Products and the NESHAP for Surface Coating of Miscellaneous Metal Parts and Products.
EUCOATLINE	PTI No. 90-14A, EU-COATINGLINE, SC IV.3	The facility did not install a combustion temperature monitor and recorder to verify the RTO operating temperature, and did not conduct performance testing to verify RTO destruction efficiency and proper operation of the RTO.

Process Description	Rule/Permit Condition Violated	Comments
EU COATLINE	PTI No. 90-14A, EU-COATINGLINE, SC V.2	Facility did not verify by testing the capture efficiency and destruction efficiency of the RTO.
EU COATLINE	PTI No. 90-14A, EU-COATINGLINE, SC VI.1	The facility is required to calculate the emission limits specified in PTI No. 90-14A, SC I.1 & 2, but has not completed the calculations as required. So the compliance verification for these limits could not be done.
EU COATLINE	PTI No. 90-14A, EU-COATINGLINE, SC IV.4 PTI No. 90-14A, EU-COATINGLINE, SC VI.3	Facility did not install, calibrate, maintain or operate a temperature monitoring device in the combustion chamber of the thermal oxidizer to monitor the temperature on a continuous basis during operation of any portion of EU-COATINGLINE.
EU COATLINE	PTI No. 90-14A, EU-COATINGLINE, SC VI.4	Facility did not keep records of coating usage, VOC content of the coatings, and monthly and annual VOC mass emissions calculations.
EU COATLINE	PTI No. 90-14A, EU-COATINGLINE, SC VI.5	Facility did not keep records of use of coatings with xylene, xylene content and daily mixed xylene mass emissions calculations.
EU COATLINE	PTI No. 90-14A, EU-COATINGLINE, SC VIII.1	The RTO stack dimensions are less than the minimum stack height and more than the maximum stack diameter.
EU COATLINE	PTI No. 90-14A, FG-MACT-PPPP, SC I.1	Facility did not verify compliance with the required emission limit.
EU COATLINE	PTI No. 90-14A, FG-MACT-PPPP, SC III.1	Facility did not establish operating limits for the RTO.
EU COATLINE	PTI No. 90-14A, FG-MACT-PPPP, SC III.2	The facility did not develop and implement a work practice plan to minimize the organic HAP emissions from the storage, mixing and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operations.
EU COATLINE	PTI No. 90-14A, FG-MACT-PPPP, SC III.3	The facility did not develop and implement a written startup, shutdown and malfunction plan (SSMP) according to the provisions of 40 CFR 63.6(e)(3).

Process Description	Rule/Permit Condition Violated	Comments
EUCOATLINE	PTI No. 90-14A, FG-MACT-PPPP, SC VI.2	The facility did not keep proper records required by 40 CFR 63.4530.
EUCOATLINE	PTI No. 90-14A, FG-MACT-PPPP, SC VI.3	The facility has not started keeping compliance options and related records for its coating operations.
EUCOATLINE	PTI No. 90-14A, FG-MACT-PPPP, SC VI.9	The facility has not installed or operated Continuous Parameter Monitoring System for its operating parameters.
EUCOATLINE	Consent Order AQD No. 13-2015, Condition No. 9B-2 PTI No. 90-14A, EU-COATINGLINE, SC IX.2 PTI No. 90-14A, FG-MACT-PPPP, SC IX.1	The facility is not in compliance with the applicable requirements of 40 CFR 63, Subparts A and Subpart PPPP.

This process is also subject to the federal Standards of Performance for New Sources (NSPS) for Industrial Surface Coating of Plastic Parts and Products. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart TTT.

This process is also subject to the federal Nation Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products and Surface Coating of Miscellaneous Metal Parts and Products. These standards are found in 40 CFR Part 63, Subpart PPPP and MMMM respectively.

During this inspection, Eteron Incorporated was unable to produce emission records. This is a violation of the recordkeeping and emission limitations specified in Special Condition number EU-COATINGLINE, SC VI.4 and FG-MACT-PPPP, SC VI.2 of PTI number 90-14A.

These conditions of PTI number 90-14A require VOC and HAP mass emission calculations and maintenance of emission records which shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 29, 2016 (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 recurrence.

If Eteron Incorporated 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 December 15, 2015. 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,



Sebastian G. Kallumkal  
Senior Environmental Engineer  
Air Quality Division  
586-753-3738

SGK/DAC

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Chris Ethridge, DEQ