



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

October 2, 2023

Terry Fletcher
Fletcher Precision Paint
6795 E 9 Mile Road
Warren, MI 48091

SRN: P0790, Oakland County

Dear Terry Fletcher:

VIOLATION NOTICE

On July 5, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Fletcher Precision Paint located at 6795 E 9 Mile Road, Warren, Michigan. The purpose of this inspection was to determine Fletcher Paint'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 161-17.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Pretreatment and cleaning of metal parts	PTI 161-17, EUSOLVENT, Special Condition II.1	The water-based cleaner used for pretreatment contains a VOC.
Pretreatment and cleaning of metal parts	PTI 161-17, EUSOLVENT, Special Condition VI.2	Acetone usage and emissions records are not maintained.
Metal parts coating line	PTI 161-17, FGRULE621, Special Condition VI.2	12-month rolling VOC calculations are not maintained; purge and clean-up solvent usage and emissions calculations are not maintained.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 23, 2023 (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 Noshin Khan at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or KhanN5@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Fletcher Paint 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 Fletcher Paint. 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,

A handwritten signature in black ink that reads "Noshin Khan". The signature is fluid and cursive, with the first name "Noshin" and last name "Khan" clearly distinguishable.

Noshin Khan
Environmental Engineer
Air Quality Division
586-536-1197

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE