

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



June 26, 2024

Justin Chambers Axalta Coating Systems, LLC 400 North Groesbeck Highway Mount Clemens, MI 48043

**Dear Justin Chambers:** 

SRN: A3569, Macomb County

## **VIOLATION NOTICE**

On April 30, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Axalta Coating Systems, LLC located at 400 North Groesbeck Highway, Mount Clemens, Michigan. The purpose of this inspection was to determine Axalta Coating Systems, LLC 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-M3569-2017a.

During the inspection, staff observed the following:

| Process Description | Rule/Permit<br>Condition Violated | Comments                    |
|---------------------|-----------------------------------|-----------------------------|
| FG-RESIN-DC8        | MI-ROP-A3569-2017a                | Axalta failed to operate    |
|                     | Section I                         | DC-8 (dust collector) while |
|                     | Special Condition 1               | operating FG-RESIN-DC8      |
|                     |                                   | for 65.8 hours between      |
|                     | Rule 910                          | July 5, 2023 and July 8,    |
|                     |                                   | 2023.                       |

As part of the on-site inspection on April 30, 2024, Axalta provided AQD with pressure drop records for DC8. Axalta noted in the records provided that the resin reactors and DC8 were shut down for a period of time prior to July 5, 2023. Axalta noted that, on July 5, 2023, the resin reactors were started back up; however, operators failed to start the dust collector, DC8. Axalta noted that the resin reactors were operated for 65.8 hours between July 5, 2023 and July 8, 2023 before DC-8 was turned back on.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 17, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 Adam Bognar at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or bognara1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Axalta Coating Systems, LLC. 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 Axalta Coating Systems, LLC. 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,

Adam Bognar

Senior Environmental Engineer

Air Quality Division

586-854-1517

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