



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

January 31, 2024

Carl Hawkins  
X-Cel Industries, Inc.  
Flex-N-Gate  
21121 Telegraph Road  
Southfield, Michigan 48033-4253

SRN: N6594, Oakland County

Dear Carl Hawkins:

**VIOLATION NOTICE**

On January 26, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of X-Cel Industries, Inc. ("X-Cel") located at 21121 Telegraph Road, Southfield, Michigan. The purpose of this inspection was to determine X-Cel'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 260-98D dated February 14, 2023.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-COATINGLINE <sup>θ</sup>	PTI No. 260-98D EU-COATINGLINE, VI.4 <sup>π</sup>	X-Cel failed to install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of EU-COATINGLINE. <sup>β</sup>
<sup>θ</sup> A metal parts coating line consisting of six (6) spray booths and a common two (2) natural gas fired curing ovens (consisting of 4 curing zones) controlled by a regenerative thermal oxidizer (RTO). Purge and clean-up included.		
<sup>π</sup> The permittee shall <b>monitor and record</b> , in a satisfactory manner, the <b>temperature in the combustion chamber</b> of the RTO on a continuous basis during operation of EU-COATINGLINE. Temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep the temperature records including temperature summary in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. <b>(R 336.1205(1)(a)(ii), R 336.1225, R 336.1702)</b>		
<sup>β</sup> In our experience, an electronic data logger system has worked well. It will suffice to record RTO temperature once every 10-15 minutes (4-6 equally time-spaced readings per hour) of RTO operating time.		

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 21, 2024 (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.

Please submit the written response to Iranna Konanahalli at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or [Konanahalli@Michigan.gov](mailto:Konanahalli@Michigan.gov) and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If X-Cel believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate 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 X-Cel. 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,



Iranna Konanahalli  
Senior Environmental Engineer  
Air Quality Division  
586-596-7630

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE  
Mike Sladewski Flex-N-Gate  
Ted Hundich Flex-N-Gate