



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

July 12, 2024

Charles Trott
Powder Cote II
P.O. Box 368
Mt. Clemens, Michigan 48046

SRN: N3308, Macomb County

Dear Charles Trott:

VIOLATION NOTICE

On June 13, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Powder Cote II located at 60 N. Rose Street, Mt. Clemens, Michigan. The purpose of this inspection was to determine Powder Cote II 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 571-92, 981-92, 354-97, 425-97, 212-98 and 45-19.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Cathodic Electrocoat System	PTI 354-97, SC 13	Facility failed to calculate hourly VOC emission rates (lb/hr)
Cathodic Electrocoat System	PTI 354-97, SC 14	Based on the submitted VOC information for the electrocoat bath, is 0.56 lb/gal (less water) which exceeds the permit limit of 0.2 lb VOC/gal (less water)
Burnoff Oven 8	PTI No. 571-92, SC 15	Based on the daily records submitted Oven 8 afterburner temperature monitor malfunctioned on 12/13/2023, 2/14/2024, 5/8/2024.
Burnoff Oven 9	PTI No. 981-92, SC 17	Based on the daily records submitted Oven 9 afterburner operated below the minimum temperature for several hours on 3/13/2024, 4/10/2024, 6/9/2024, 6/11/2024, 6/12/2024, 6/13/2024, 6/14/2024.

Burnoff Oven 10	PTI No. 425-97, SC 15	Based on the daily records submitted for 1 day/week for a few weeks, Oven 10 afterburner was operating below the required temperature all days reviewed.
Burnoff Oven 11	PTI No. 212-98, SC 2	Based on the daily records submitted for 1 day/week for a few weeks, Oven 11 afterburner temperature monitor was malfunctioning during all days reviewed.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 2, 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 Sebastian Kallumkal at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or KallumkalS@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Powder Cote II 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 Powder Cote II. 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
Environmental Engineer Specialist
Air Quality Division
586-201-0175

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