

7/9/2015

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Brian McFall
thelamco, inc.
1202 Teritorial Road
Benton Harbor, MI 49022
SRN: B6608, Berrien County



E-MAILED

7-10-15 M.A.D.

Matt Deskins
7953 Adobe Road
Kalamazoo, MI 49009

Dear Mr. Deskins,

Re: MDEQ Violation Notice of 6/16/2015 following the 6/4/2015 inspection of thelamco's facility.

Thank you for the opportunity to address the issues presented in your Violation Notice. Thank you, too, for the professional manner you displayed during your unscheduled inspection and corresponding write-up.

We are all stewards of the world we leave to our future generations, and thelamco, inc. is committed to work with your team to comply with the emission guidelines governing our facility operations.

Recap of Violations cited...

Issue #1: FGLAMINATORS

Rule/Permit Condition Violated Conditions I.1 and I.2 under the Emission Limits and VI.5.a under the Monitoring/Recordkeeping of PTI #597-87A

MDEQ Comments: The Facility was not keeping volatile organic compound (VOC) monthly emission records by calendar day. Also, the Facility has not been tracking usage and emissions in their purge and cleanup solvent operations (waste and/or reclaimed).

Issue #2: FGFACILITY

Conditions I.1, I.2, and I.3 under Emission Limits of PTI #597-87A

MDEQ Comments: The Facility was not tracking hazardous air pollutant (HAP) emissions in a 12 month rolling format.

Issue#3: FGFACILITY

Condition VI.2 under Monitoring/Recordkeeping of PTI-87A

MDEQ Comments: The Facility has not been tracking usage and emissions from any HAP solvents used in their purge and cleanup solvent operations (waste and/or reclaimed).

Issue #4: FGFACILITY

Condition VI.3 under Monitoring/Recordkeeping of PTI-597-87A

MDEQ Comments: The Facility has not been tracking usage and emissions from all VOC solvents used in their purge and cleanup solvent operations (waste and/or reclaimed).

Thelamco responses:

Issue #1a: Thelamco has been tracking, on a daily basis, the VOC emissions of adhesives and coatings applied for over twenty years. In fact, we dive into further detail as we track per order, as well as per process for each day. For each daily job run, the machine operators and the coating operators each keep a journal tracking applied coating amounts as well as other production data necessary for compliance with MDEQ/EPA guidelines and production efficiency analysis. Specifically, we track daily, the applied amount of each particular coating and the percent solids these coatings are applied at.

I've attached copies of the journal forms used by our crews showing the information tracked. On a daily basis, these journals are filled and filed in their perspective order job jacket. All pertinent information relating to every process for every production order's job jacket is entered into a computer spreadsheet by our Production Manager. While a daily loading of all this information into the digital (PLOG) production log spreadsheet would be cumbersome, we make every effort to enter this data into the spreadsheet as jobs are completed or by Friday of each week. The spreadsheet breaks down the components of the coatings applied into the perspective applied amounts of each solvent as determined by the supplied coating manufacturer's MSDS and applied percent solids which are verified during production on our lab equipment and logged into the Operator's journal.

While technically, we may be out of compliance with the exact wording of this guideline in our permit since this VOC/HAP data isn't vetted out until the journal information is actually entered into the PLOG by Friday of each week, we are tracking this and all emissions are traceable to each process of each order run daily. We feel we are following the guidelines set for our permit to the best of our ability.



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It would seem that this particular guideline in the permit is meant to verify that our daily emission limit per VOC is below the specified limit of 1,000lbs/day. I've attached another spreadsheet showing the emission records of each solvent per month as well as a 12 month rolling tally of each of these applied solvents. This tally shows records going back over five years of production. In this spreadsheet you will notice that for the most part we fall well short of the 1,000lb daily emission limit per VOC even on a monthly sum basis.

Please consider the efforts we have in place already to track and report all daily emissions. We truly feel that we are following the guidelines set forth in our permit. The daily vetting of actual VOC/HAP emissions would be onerous and counter-productive to our daily operations. If your team feels that we are not meeting this specific guideline satisfactorily then we need further discussion on what steps to take to modify our permit to allow for more flexibility in this vetting process.

Issue 1b: Thelamco has struggled with how best to track our purge and cleanup solvents. On Monday July 13th, 2015 we will initiate a new tracking procedure for this particular process. Initial solvent weight prior to purge/cleanup, less reclaimed solvent weight, less scrapped solvent weight (hazardous waste), less retained solvent will yield the net emission of the cleanup solvent. We will track each cleanup emission tied to date and order number in a separate form that all employees will be instructed to complete. This form will be used and entered into a spreadsheet accumulating the total net emissions from the cleanup operations and then these net emissions will be added to the VOC/HAP emissions tally spreadsheet where monthly and 12 month rolling tallies are stored for each solvent emission.

Issue #2: This issue has now been resolved as of June 5th, 2015. We are tracking each and all monthly solvent emissions including VOC and HAP solvents, as well as rolling 12 month tallies of each solvent emitted going back five plus years. See attached VOC/HAP Tally spreadsheet.

Issue #3: Please see response to issue #1b above. Also note that currently toluene is the only HAP solvent in use at this time. We anticipate no net emission from our cleanup/purge when using this solvent since we are able to reclaim the cleanup toluene completely. But it too will be tracked on our cleanup/purge form and any net emissions from this process, if any, will be added to the monthly and twelve month rolling tally spreadsheet.

Issue #4: Please see response to issue #3 and issue #1b above.

Thank you for the opportunity to respond to the Violation Notice dated June 16th, 2015. I trust I have conveyed our willingness to comply with the guidelines listed in our PTI #597-87A. We

thelamco, inc.

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understand that we have an ongoing responsibility to track reportable emissions and be good stewards of the environment we may impact through our processing. I welcome your feedback to the responses I've offered to the issues you have raised as a result of your inspection. Know that your team has a willing partner in thelamco.

I am also in receipt of your Activity Report dated June 16th, 2015. I would like to schedule further discussion with you and your superior regarding this separate document at your earliest convenience. I am most flexible on Fridays, and can arrange to meet with your team in Kalamazoo or here in Benton Harbor. We could also handle this over the phone if you prefer. Please let me know your preference. Thank you.

Sincerely,

Brian McFall
President/CEO
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