

T H E L A M C O , I N C O R P O R A T E D

January 25, 2019

Mr. Matt Deskins
Environmental Quality Analyst
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009-5026

Dear Mr. Deskins:

This letter is in response to your Department's Letter of Violation that was sent to us on December 20, 2018. That letter resulted from your visit to Thelamco, incorporated's facility in Benton Harbor on December 4, 2018, where it was found that we are non-compliant to Special Condition #13 requiring Thelamco to have continuously monitoring instrumentation of the temperature inside the chamber of our thermal oxidizer.

We have in our plant an instrument purchased from Combustion Control Solutions & Environmental Services, Inc. (3132 Wolford Drive, Toledo, OH 43617). The instrument purchased (YOKOGAWA DAQ STATION FX100) is designed to continuously monitor and record digitally the operating temperature, along with the date, & time of oxidizer operation. The FX100 stores data logged from incinerator operation whenever the incinerator is activated. Tracked data is logged on a removable card/disk that has data stored on it since installation. During the MDEQ visit on December 4, 2018 and for several years prior to this visit, we have been unable to access this data due to several upgrades to our computers and computer network. The data logger continued its recording of incinerator data through the time since its installation. We were just unable to read and print out this data. As our standard operating procedures, crews were instructed to manually record on their Production Data Sheets when the incinerator was in use, and the actual temperature in the incinerator. This practice has been observed since 2008 as a backup tracking of pertinent incinerator data.

- 1) The Letter of Violation asks that I explain the causes and duration of this violation. Our thermal oxidizer has displays that monitor temperature. The temperature is set to fire at 1400 degrees. When our machine is stopped (and no solvents are being supplied to oxidizer) the temperature will drop to 1370 momentarily until the supply gas valve reacts to again bring it back to 1400 degrees. So the temperature is pretty fixed, and always has been. Discussions in the past with MDEQ representatives touched on this condition during plant inspections and it was conveyed to me that tracking of incinerator usage on our production paperwork would suffice. However, we were able to track down the software package that enable us to read the data logged on the incinerator tracker. So now we are capable of printing out past and future incinerator data. Furthermore, we have again upgraded our computer system to now store documents and software on the Cloud as opposed to our local server. This should allow us to avoid specific software from getting lost as we try to keep pace with improvements in work computers and software.
- 2) The second violation cited in the Violation Notice (12/20/18) refers to thelamco, inc. failing to have supplied solvent based coatings tested in outside labs per EPA Method 24. I had never heard of this before, and frankly this request is too onerous for a company our size. We receive coatings into our plant that have already been tested and documented via MSDS (assumedly using a Method 24 approach). Any variation to the supplied coatings, through dilution, are recorded and factored for emission reporting. We have used this approach from our inception. Therefore, I ask that we be spared from the requirement to have any outside EPA Method 24 testing, and be allowed to continue to use information as outlined in each specific MSDS for coatings which we apply in our processing.

Sincerely,



Brian L. McFall; President / C.E.O.