



Lafata Enterprises Inc.
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April 12, 2019

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CC: Ms. Jenine Camilleri
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From: Jim Jensen
Lafata Cabinet
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Ref: **Violation Notice dated March 25, 2019.**

This correspondence is our response to the above violation notice. As stated in the notice, this violation concerns the E63W50 Primer/Surfacer we purchase from Sherwin Williams and the associated reducer & catalyst. The extent of the exceedance has remained 2183 gallons of E63W50 applied using the reduction method of 45 ounces of R7K310. This only affected our ROP material limit on autoline2 and did not result in exceeding any other voc limit we currently operate under. The dates of the violation included in the deviation report are 1/1/18 to 3/5/19.

After receiving the method 24 results from Sherwin Williams we immediately stopped adding 45 ounces of R7K310 reducer. At first we tried to run the product with only 25 ounces of R7K310, We found the viscosity to be too heavy and the material would not flow out and lay flat on our parts. As I stated on the additional comment page submitted with the deviation report we investigated non-voc solvents that could possibly be used to reduce the viscosity of the material but do not meet the definition of VOC or have been excluded from the definition. These solvents were acetone, tert-butyl acetate, methyl acetate and para-chlorobenzotrifluoride. Because we had on hand a small amount of tert-butyl acetate and acetone in our plant these two products were experimented with first. We added 25 ounces of R7K310 Reducer per gallon of catalyzed E63W50 (as demonstrated on the method 24 results to meet our VOC material limit) and we added 10

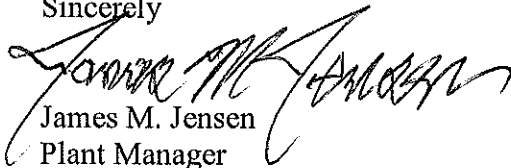
ounces of acetone and 10 ounces of tert-butyl acetate. This brought our reduction amount back up to the 45 ounces we had been running but without the additional voc. This is how we are currently applying the E63W50. This conversion varnish coating system continues to cure, crosslink and pull down tighter into the wood for approximately 30 days depending somewhat on environmental conditions the finished parts are subjected to in that timeframe. We at this time do not have enough experience with this reduction mixture to be confident that this will be our long term solution to the problem. It was however, a very quick and fairly simple solution, if it proves out to not be detrimental to the final quality of the fully cured finish system we are using.

When autoline2 was installed, replacing "autoline" we had decided we were going to deal with Valspar for our coatings and prior to the application for the permit to install we were wide open to whatever product they had recommended to us for primer. After we were given the information on the coating they were recommending and with them knowing that I was applying for a permit to install and the permit would be derived from that information, I was given bad information. So the primer we used to apply for was low voc because for one thing it was very heavy solids and thick viscosity and they did not tell me that we would need to reduce it by 100% or what we would use to reduce it?? After trying numerous products and struggling to find any primer I could run on the autoline2 for months we said to Valspar "ok so we screwed up our permit because you gave us bad information so what do you have that works? How much voc do you need to make it work? And we then we basically applied for a new permit to install in order to change the voc limit on the sealer/primer. I asked Asad at that time, if it was possible to get a VOC limit of 5 lbs/gal instead of 4.6 just to give us a little flexibility but was told that is not possible. And again Valspar still could not make us a primer to meet the VOC limit they told us they needed. So Sherwin Williams inherited this 4.6 lb/gal limit and they have been struggling with it a bit also. Originally telling us to reduce the E63W50 with 55 ounces of R7K310. We performed our due diligence and ran our own calculations and told them that the product would exceed our limit and we showed them the calculations demonstrating this. The local rep contacted the lab in North Carolina and three days later the Rep came back and said 45 ounces is what the lab calculated would meet our limit and we should try that and see how it runs. So we did it. We also ran our own calculation and agreed that we should be below our limit.

We have strived to maintain compliance with our ROP since it was issued to us but I must say that in this case we believed we were within our limit based on the calculated VOC of the E63W50, V66V21 catalyst, and the R7K310 reducer. We did the calculations and if the information provided to us by Sherwin Williams had been accurate we would never have had an exceedance at all. I know our permit states that we need to use method 24 unless utilization of formulation data has been approved by the district supervisor (I had received approval during our original ROP, I didn't realize that approval ended with the permit renewal). The reality is that it is a constant battle with suppliers to provide us with these test results because it apparently is not normally required by their customers and frequently I have received calls from the supplier's environmental manager so they can explain to me that method 24 results are not required in air quality permits. With Sherwin Williams, I had to actually send their environmental manager a partial copy of our permit in order to get them to run the method 24 test at all. It seems to me that the supplier has to be held accountable for the accuracy of the

information on their environmental data sheet. You, I and the rest of mankind should be able to rely on that information, otherwise what's the point in requiring me to maintain an EDS on file for every material we use if I can't use and rely on the information it contains? It is obvious to me that at least one and perhaps more than one of the EDS'S involved in this violation are incorrect or inaccurate to the point where when put to the actual method 24 test we failed. In this particular case the chemist or technician who was to perform the test, measured and mixed the three materials to arrive at our "as applied" sample to very exacting standards in the lab. And failure was the result. It was our hope when we replaced our old spray finishing line that we would be able to run a standard product "out of the can" and operate our business without having to run a customized finishing product which would allow us the flexibility to purchase product and run product from various suppliers without having to "customize" them. If regulators are permitting us at 0.1 lbs VOC/gal over what the EDS stated content is, the accuracy of the EDS information is uncontrolled, There are human being weighing and measuring the contents of coating products manufactured by the suppliers. Then I guess that will never happen and we are destined to be chained to the one supplier that has or can make a product that fits the limits of our permit. Or we will never be allowed to keep an ROP for the duration of the 5 year lifespan because every time we make a minor change or if we need to change suppliers then we will also need to apply for major modifications or a new permit in order to change these limits.

Sincerely



James M. Jensen
Plant Manager

Lafata Enterprises Inc.