



Resent to correct typos



July 28, 2017

Adam Shaffer
Environmental Quality Analyst
Air Quality Division – DEQ
350 Ottawa Ave. NW
Unit 10
Grand Rapids, MI 49503-2341

Dear Adam,

This letter is in response to the Violation Notice dated July 12, 2017. The violations that were observed are listed below with the corrective actions that are being put in place to correct the violations.

EU-CoaterE	PTI No.192-03F, Special Conditions (SC) VI.3.b-d	Incomplete Records
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This violation went from February 1, 2016 through July 21, 2017. The numbers for the VOC's for the adhesives were done using the information supplied by the manufacturer. Method 24 testing has been done on seven (7) water-based adhesives per our PTI No. 192-03F, this information is currently being used for the VOC content of the formula in the record keeping for this line. In addition to this, the DEQ-Air Quality Division, was supplied with both the emulsion and solvent spreadsheet with all of the abbreviations and data that is used in the record keeping. The records for this coating line have been updated with correct information from February 1, 2016 to the current date.

EU-CoaterF	PTI No.192-03F, SC VI.3.b-d	Incomplete Records
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This violation went from February 1, 2016 through July 21, 2017. The numbers for the VOC's for the adhesives were done using the information supplied by the manufacturer. Method 24 testing has been done on seven (7) water-based adhesives per our PTI No. 192-03F, this information is currently being used for the VOC content of the formula in the record keeping for this line. In addition to this, the DEQ-Air Quality Division, was supplied with both the emulsion and solvent spreadsheet with all of the abbreviations and data that is used in the record keeping. The records for this coating line have been updated with correct information from February 1, 2016 to the current date.



FG-SolventBased PTI No.192-03F, Incomplete Records
 SC VI.3.d-g and
 SC VI.4.d-f

This violation went from February 1, 2016 through August 1, 2017. The numbers for the VOC's for the adhesives were done using the information supplied by the manufacturer. Method 24 testing has been done on eight (8) solvent-based adhesives per our PTI No. 192-03F, this information is currently being updated and will start being used no later than August 1, 2017 for the VOC content of the formula in the record keeping for this process unit. In addition to this, the DEQ-Air Quality Division, was supplied with both the emulsion and solvent spreadsheet with all of the abbreviations and data that is used in the record keeping.

FG-Facility PTI No.192-03F, Incomplete Records
 SC VI.2.c-e and
 SC VI.3.c-e

This violation went from February 1, 2016 through August 1, 2017. The numbers for the VOC's for the adhesives were done using the information supplied by the manufacturer. Method 24 testing has been done on eight (8) solvent-based adhesives and seven (7) water-based adhesives per our PTI No. 192-03F, this information is currently being updated and will start being used no later than August 1, 2017 for the VOC content of the formula in the record keeping for this process unit. In addition to this, the DEQ-Air Quality Division, was supplied with both the emulsion and solvent spreadsheet with all of the abbreviations and data that is used in the record keeping. The manufacturers of the adhesives will be contacted to get the latest VOC and HAP's information. This information will then be used to supplement the Method 24 data to ensure compliance.

Updated records for February 2016 through February 2017, will be available for resubmission or review no later than August 15, 2017. This will be done using the current information available with the correct calculations. These updated records/spreadsheets will now have a tab in each of them for the emulsion and solvent based abbreviations and data.

We currently review the Coater D records once a month. We are going to continue to review Coater D once a month and start including on a rotational basis EU-CoaterE, EU-CoaterF, FG-Solventbased, or FG-Facility. This information shall be documented by the person(s) doing the review. This will help to provide a more thorough and complete review.

The top two manufacturers of the adhesives used have already been contacted and the information requested for current VOC and HAPs content. As the information comes in, the data that is currently used will be checked and updated as needed. This will continue until all adhesives have been updated, current projected date for all of this to be done is October 1, 2017.



The Preventative Maintenance/Malfunction Abatement Plan has been updated to remove the reference to Coater A. This coater was originally hooked up to the RTO, but has been decommissioned. The updated plan will be submitted electronically on August 17, 2017.

Two printers were identified during the inspection, a Canon iPF8000S and Roland TrueVIS VG-640. These two printers are used for the production of a product for field testing and/or market testing. As such they should be exempted per R 336.1283 Rule 283 section 2 subset vi and/or R 336.1283 Rule 283 section 3 subset c.

Sincerely,

Rob Bachholzky
Compliance Manager



July 28, 2017

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Environmental Quality Analyst
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Dear Adam,

This letter is in response to the Violation Notice dated July 12, 2017. The violations that were observed are listed below with the corrective actions that are being put in place to correct the violations.

EU-CoaterE PTI No.192-03F, Incomplete Records
Special Conditions (SC)
VI.3.b-d

This violation went from February 1, 2016 through July 21, 2017. The numbers for the VOC's for the adhesives were done using the information supplied by the manufacturer. Method 24 testing has been done on seven (7) water-based adhesives per our PTI No. 192-03F, this information is currently being used for the VOC content of the formula in the record keeping for this line. In addition to this, the DEQ-Air Quality Division, was supplied with both the emulsion and solvent spreadsheet with all of the abbreviations and data that is used in the record keeping. The records for this coating line have been updated with correct information from February 1, 2016 to the current date.

EU-CoaterF PTI No.192-03F, Incomplete Records
SC VI.3.b-d

This violation went from February 1, 2016 through July 21, 2017. The numbers for the VOC's for the adhesives were done using the information supplied by the manufacturer. Method 24 testing has been done on seven (7) water-based adhesives per our PTI No. 192-03F, this information is currently being used for the VOC content of the formula in the record keeping for this line. In addition to this, the DEQ-Air Quality Division, was supplied with both the emulsion and solvent spreadsheet with all of the abbreviations and data that is used in the record keeping. The records for this coating line have been updated with correct information from February 1, 2016 to the current date.



EU-SolventBased PTI No.192-03F, Incomplete Records
 SC VI.3.d-g and
 SC VI.4.d-f

This violation went from February 1, 2016 through August 1, 2017. The numbers for the VOC's for the adhesives were done using the information supplied by the manufacturer. Method 24 testing has been done on eight (8) solvent-based adhesives per our PTI No. 192-03F, this information is currently being updated and will start being used no later than August 1, 2017 for the VOC content of the formula in the record keeping for this process unit. In addition to this, the DEQ-Air Quality Division, was supplied with both the emulsion and solvent spreadsheet with all of the abbreviations and data that is used in the record keeping.

EU-SolventBased PTI No.192-03F, Incomplete Records
 SC VI.3.d-g and
 SC VI.4.d-f

This violation went from February 1, 2016 through August 1, 2017. The numbers for the VOC's for the adhesives were done using the information supplied by the manufacturer. Method 24 testing has been done on eight (8) solvent-based adhesives and seven (7) water-based adhesives per our PTI No. 192-03F, this information is currently being updated and will start being used no later than August 1, 2017 for the VOC content of the formula in the record keeping for this process unit. In addition to this, the DEQ-Air Quality Division, was supplied with both the emulsion and solvent spreadsheet with all of the abbreviations and data that is used in the record keeping. The manufacturers of the adhesives will be contacted to get the latest VOC and HAP's information. This information will then be used to supplement the Method 24 data to ensure compliance.

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The top two manufacturers of the adhesives used have already been contacted and the information requested for current VOC and HAPs content. As the information comes in, the data that is currently used will be checked and updated as needed. This will continue until all adhesives have been updated, current projected date for all of this to be done is October 1, 2017.

The Preventative Maintenance/Malfunction Abatement Plan has been updated to remove the reference to Coater A. This coater was originally hooked up to the RTO, but has been decommissioned. The updated plan will be submitted electronically on July 31, 2017.



Two printers were identified during the inspection, a Canon iPF8000S and Roland TrueVIS VG-640. These two printers are used for the production of a product for field testing and/or market testing. As such they should be exempted per R 336.1283 Rule 283 section 2 subset vi and/or R 336.1283 Rule 283 section 3 subset c.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Bachholzky". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Rob Bachholzky
Compliance Manager