

July 14, 2023

Rachel Benaway
EGLE, AQD Kalamazoo District
7953 Adobe Road,
Kalamazoo, MI, 49009

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RE: SRN: N0931 (171-12) Violation Notice Response

On June 7, 2023, an EGLE air permitting inspection was conducted at the Modineer Coatings Division - North site location; located at 2200, East Empire Avenue, Benton Harbor, MI, 49022. The items of concern and our response is noted below.

Item 1 PTI #171-12, Special Condition (SC) IV.4: Shall not operate EU-BURNOFF unless a device to monitor temperature is installed.

Modineer Company understood the rule to include this oven as an integral part of our powder coating process and therefore included in the same exemption under R 336.1287(d) "A powder coating booth and associated ovens." The EU-BURNOFF oven After our most recent air inspection at our Benton Harbor facility, we have purchased a digital datalogging device and will begin monitoring with it upon the next use of the oven.

Item 2 PTI #171-12, SC VI.3: Shall keep temperature data records for burn-off oven secondary chamber or afterburner (5 years) and make available upon request.

We are unable to produce any records of the burn-off oven secondary chamber afterburner as a means of monitoring the afterburner temperature was while the oven was in operation for the previous 5 years. We have installed a digital datalogging device and shall begin the necessary monitoring and recordkeeping as required.

As we have no records to prove otherwise at this time, we have no reason to believe that EU-BURNOFF's secondary chamber afterburner ran below its' normal set control point of 1,500 degrees F.

Item 3 PTI#171-12, SC VI.4: Provide records of date, duration, and description of any malfunction of secondary chamber or afterburner and any maintenance performed or testing results for EU-BURNOFF.

We are unable to produce any records of the burn-off oven secondary chamber afterburner as a means of monitoring the afterburner temperature was while the oven was in operation for the previous 5 years. We have installed a digital datalogging device and shall begin the necessary monitoring and recordkeeping as required.

As we have no records to prove otherwise at this time, we have no reason to believe that EU-BURNOFF's secondary chamber afterburner ran below its' normal set control point of 1,500 degrees F

Item 4 PTI#171-12, SC VI.5: Maintain current list from manufacturer of chemical composition of each material (cured coating, oil, or grease) processed in EU-BURNOFF, including weight percent of each component. Data may be MSDS, manufacturer's formulation data, or both.

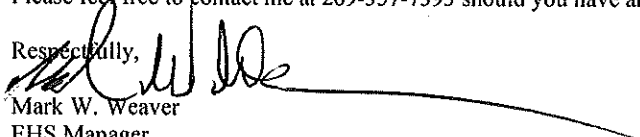
This information was provided electronically previously. Copies of all paint product SDS sheets for material processed in EU-BURNOFF in response to this request (Exhibit A).

Item 5 PTI#171-12, SC VI.6: Maintain current information from manufacturer that EU-BURNOFF is equipped with secondary chamber or afterburner, an automatic temperature control system for primary and secondary chambers or afterburner, and an interlock system that shuts down primary chamber burner when secondary chamber of afterburner is not operating properly.

Included as Exhibit B, is an excerpt from the "Pollution Control Products Company" website listing the typical components for EU-BURNOFF, along with copies of information contained within the service manual maintained on site for EU-BURNOFF by Modineer Coatings.

Please feel free to contact me at 269-357-7393 should you have any questions.

Respectfully,



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