

JUN 28 2016



TIDI PRODUCTS, LLC • 14241 N. FENTON ROAD • FENTON, MI 48430-1541  
t. 810.750.5300 • f. 810.750.5310 • www.tidiproducts.com

June 19, 2016

State of Michigan  
Department of Environmental Quality  
Lansing District Office  
Air Quality Division  
Attn: Julie L. Brunner, P.E.  
Constitution Hall  
525 West Allegan Street  
P.O. Box 30242  
Lansing, MI 48909-7742

RE: SRN: N1912, Genesee County

Ms. Brunner:

This response is in relation to your visit to our facility at 14241 N. Fenton Rd., Fenton, MI 48430 on May 24<sup>th</sup>, 2016 and the Violation Notice from that visit dated May 31<sup>st</sup>, 2016.

Following are our responses to the rule/permit condition violations in the above letter.

**For rule/permit condition violated PTI 34-00A, Special Condition (SC) III.4 :**

Records of the number of booths operating including the date and time that each paint booth was operated are kept. This data is obtained through the use of an automated program which is then saved to our internal network.

Due to the sudden change of facility related responsibilities that occurred just a few weeks prior to your visit, neither I nor Cherie Isaac, Facilities Assistant, were familiar enough with this reporting process to produce the proper report for your inspection.

I therefore request an extension until July 31<sup>st</sup>, 2016 on the above matter. During this time I will work with our programmers and our I.T. Department to produce the report requested.

**For rule/permit condition violated PTI 34-00A, (SC) VI.3 :**

Records of VOC and Acetone mass emission calculations determining the monthly and the annual emission rate in tons per 12-month rolling time period are kept. This information is entered daily into a spreadsheet by our Facilities Assistant.

Due to the sudden change of facility related responsibilities that occurred just a few weeks prior to your visit, neither I nor Cherie Isaac, Facilities Assistant, were familiar enough with this reporting process to produce the proper report for your inspection.

I therefore request an extension until July 31<sup>st</sup>, 2016 on the above matter. During this time I will work with our programmers and our I.T. Department to roll up the daily records we maintain into a 12-month rolling report as requested.

**For rule/permit condition violated PTI 34-00A, (SC) VI.4 :**

Records of Xylene mass emission calculations determining the daily emission rate in pounds per calendar day are kept. This information is entered daily into a spreadsheet by our Facilities Assistant.

Due to the sudden change of facility related responsibilities that occurred just a few weeks prior to your visit, neither I nor Cherie Isaac, Facilities Assistant, were familiar enough with this reporting process to produce the proper report for your inspection.

I therefore request an extension until July 31<sup>st</sup>, 2016 on the above matter. During this time I will work with our programmers and our I.T. Department to produce the report requested.

In response to the use of Isopropyl Alcohol within the facility, please note this material is not used in the booth area or coating paint lines. It is my understanding that when this material is not used in this manner, daily emission rates are not required. Therefore, if possible, I request this violation be removed from the Notice.

**For rule/permit condition violated PTI 34-00A, (SC) VI.2 :**

Records of individual and aggregate HAP mass emission calculations determining the monthly and the annual emission rate in tons per 12-month rolling time period are kept. This information is entered into a spreadsheet by our Facilities Assistant.

I would like to request an extension until July 31<sup>st</sup>, 2016 on the above matter. During this time I will work with our programmers and our I.T. Department to roll up our records to produce the 12-month rolling report as requested.

**For rule/permit condition violated PTI 35-15, (SC) III.1, IV.1 and VI. :**

In regards to the violations related to the bulbcruiser, please note, as of June 15<sup>th</sup>, 2016 this piece of equipment was properly taken out of service. We have outsourced this process to a 3<sup>rd</sup> party industrial waste company.

I would like to formally request that the bulbcruiser be removed from our permit.

In summary, I hope I have addressed all the points identified in your letter. Please don't hesitate to contact me if there is anything I have missed or if any clarification is needed.

Sincerely,

Terry Byers  
Manufacturing Manager

