



TOEFCO ENGINEERED COATING SYSTEMS, INC.

1220 North 14th Street • Niles, MI 49120 • (269)-683-0188 • (800)-555-6495 • Fax (269) 683-8408



January 2, 2019

Mr. Matt Deskins
Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009-5025

RE: Response to the December 20, 2018 Violation Notice Issued to Toefco Engineered Coating Systems, Inc.; SRN: N2610

Dear Mr. Deskins:

Toefco Engineered Coating Systems, Inc. (“Toefco”) is in receipt of the December 20, 2018 Violation Notice issued by the Kalamazoo District Office (the “District”) of the Michigan Department of Environmental Quality, Air Quality Division (“AQD”) for the above-referenced facility. The Violation Notice cites Condition 23 of Section A of Renewable Operating Permit No. MI-ROP-N2610-2017 (the “ROP”) and Rule 213(3)(c)(i) of Act 451, which require the facility to submit a report at least once every six months in writing to AQD of all instances of deviations from ROP requirements. The report noted was to have been postmarked or received at District AQD by September 15, 2018. While Toefco prepared this report on September 12, 2018 and subsequently submitted the report to the District via U.S. Mail prior to the deadline, the Violation Notice states that the District has not received Toefco’s semi-annual monitoring and deviation report.

Pursuant to your request within the Violation Notice, Toefco is providing a copy of the semi-annual monitoring and deviation report for the period January 1 – June 30, 2018. The report





MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
DEVIATION REPORT**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating Permit (ROP) for which deviations required to be reported by R 336.1213 (Rule 213) subrule (3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Toefco Engineered Coatings, Inc. County Berrien

Source Address 1220 North 14th Street City Niles

AQD Source ID (SRN) N2610 ROP No. MI-ROP-N2610-2017 ROP Section No. NA

ROP Section Contact Artie McElwee III Contact Phone No. 800-555-6495

Reporting Period (provide inclusive dates): From Jan 01, 2018 to Jun 30, 2018

Report Type: Annual Semi Annual Other (Describe) _____

1. Group or Source Wide ID Section A Gen Cond	2. Condition No. 19	3. Date(s) of Occurrence 03/15/18 to 05/31/18	4. Previously reported? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 05/31/18 submittal	5. Duration of Deviation 75 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation RO certification of annual compliance with ROP conditions during the preceding period was delayed beyond reporting date	
8. Reason for Deviation and Description of Corrective Action Taken Oversight of the reporting required was an oversight of schedule and delegation responsibility among the ROP compliance team, due to the recent nature of ROP issuance to the stationary source. Upon discovery, the appropriate report was submitted and a corrective action for ROP reporting review and oversight was implemented.				

1. Group or Source Wide ID Section A Gen Cond	2. Condition No. 23	3. Date(s) of Occurrence 03/15/18 to 05/31/18	4. Previously reported? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 05/31/18 submittal	5. Duration of Deviation 75 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Reporting and RO certification of semi-annual deviations from ROP conditions during the preceding period was delayed beyond reporting date	
8. Reason for Deviation and Description of Corrective Action Taken Oversight of the reporting required was an oversight of schedule and delegation responsibility among the ROP compliance team, due to the recent nature of ROP issuance to the stationary source. Upon discovery, the appropriate report was submitted and a corrective action for ROP reporting review and oversight was implemented.				

1. Group or Source Wide ID	2. Condition No.	3. Date(s) of Occurrence	4. Previously reported? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date	5. Duration of Deviation
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation	
8. Reason for Deviation and Description of Corrective Action Taken				



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Toefco Engineered Coatings, Inc. County Berrien

Source Address 1220 North 14th Street City Niles

AQD Source ID (SRN) N2610 ROP No. MI-ROP-N2610-2017 ROP Section No. NA

Please check the appropriate box(es):

Annual Compliance Certification (Pursuant to Rule 213(4)(c))

Reporting period (provide inclusive dates): From _____ To _____

1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From Jan 01, 2018 To Jun 30, 2018

1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

Other Report Certification

Reporting period (provide inclusive dates): From _____ To _____

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Artie McElwee III President 800-555-6495
 Name of Responsible Official (print or type) Title Phone Number

[Signature] JRES 9/12/18
 Signature of Responsible Official Date

Photocopy this form as needed. JRES EQP 5736 (Rev 11-04)
 1/2/18



Brooke Horner <brooke@toefco.com>

Re: Plant 1 Semi-Annual Deviation Report

1 message

Brooke Horner <brooke@toefco.com>

Wed, Sep 12, 2018 at 12:05 PM

To: "Brian P. Greenwald" <BGreenwald@barr.com>

Cc: Artie McElwee <artie@toefco.com>

Good morning Brian,
Attached you will find the signed documents.
Have a great day.
Best Regards,

Brooke Horner*Office Personnel***TOEFCO ENGINEERED COATING SYSTEMS, INC.**

Home of PowershieldCoatings.com
1220 N.14th Street
Niles MI. 49120

P: 269.683.0188
Fax: 269.683.8408

On Wed, Sep 12, 2018 at 9:43 AM Brian P. Greenwald <BGreenwald@barr.com> wrote:

Artie,

Attached please find two Word files that will constitute the Jan-Jun 2018 semi-annual deviation report required by the Plant 1 ROP. Please print out these forms, and sign and date as indicated on the bottom of the Report Certification form.

Once completed, please make a copy for your environmental files (and email a scanned copy back to me) and send the signed original forms to District AQD at:

Michigan Department of Environmental Quality

Air Quality Division

Kalamazoo District Office

7953 Adobe Road

Kalamazoo, Michigan 49009-5026

If we can get this out today, that would be great – but the letter needs to be postmarked no later than this Friday. Please call me if you have any questions or concerns.

Regards,

Brian P. Greenwald, PE

Senior Chemical Engineer

Grand Rapids, MI office: 616.512.7012

cell: 616.723.1377

BGreenwald@barr.com

www.barr.com



If you no longer wish to receive marketing e-mails from Barr, respond to communications@barr.com and we will be happy to honor your request.

2 attachments

