



State of Environment, Great Lakes and Energy

301 East Louis Glick Highway

Jackson, Mi 49201

Attention: Mike Kovalchick

The violation notice letter was received by DAPCO Industries on November 14<sup>th</sup>, 2022. Upon receiving the letter, a Response Team was formed. The team consists of the following:

- Michelle Byrnes: Materials Manager
- Randy Arnett: Vice President of Operations
- Julie Koch: Human Resources Manager
- Roy McCall: Material Handling Supervisor
- Ron Tupper: President

Furthermore, ASTI Consultants have been contacted and a meeting is set for 12/7/22.

The team has worked together to develop the following response to the letter.

**Violation 1: 1000-gallon ammonia storage tank: no permit to install. Note the distance to nearest residential home is 250 feet so would not qualify for a general PTI permit.**

The original lease was requested from the supplier, and this tank was installed in 1989. At that time there were no houses within 300 feet.

Action Items:

- Requirements for PTI permit and options will be discussed with consultant.
- DAPCO has obtained quotes from Tanner Industries to replace the current 1000-gallon tank with a 500-gallon tank (copies available upon request). The consultant will assist DAPCO with the necessary actions to correct this violation.

**Violation 2: Vapor degreaser room: 40 foot-tall-stack required for general ventilation is missing.**

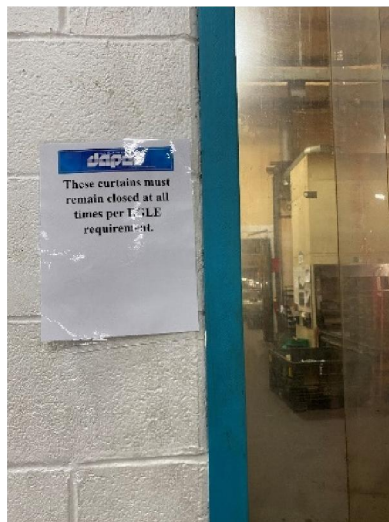
During 2019 DAPCO industries was told that they did not need the stack and it was removed. DAPCO has contacted the degreaser manufacturer to learn more about the design of the equipment and ventilation requirements.

Action items:

- Requirements and options will be discussed with consultant at meeting.
- Requesting quotes on a new stack.
  - Force Mechanical no quoted on 11/30/2022.
  - Applegate visited facility to quote on 12/5/2022, formal quote to follow.

**Violation 3: Room housing vapor degreaser had open bay door to outside open and plastic curtains to rest of plant.**

On the day of the audit the department supervisor was on vacation and the door to the outside and the internal curtains were open. This is not DAPCO's normal operating procedure. As a short-term solution, signs have been posted on all the door openings and the policy was reviewed with all employees. Long term solutions, such as air curtains, are being researched.



**Violation 4: Vapor degreaser has no lid.**

The team researched this requirement as the unit is self-contained. DAPCO contacted the degreaser manufacturer to learn more about the design of the equipment. The manufacturer identified that DAPCO’s unit does not require a lid because the degreaser meets option 4 from Table 2 found in the 40 CFR Part 63 Subpart T regarding Control Combinations for Batch Vapor Solvent Cleaning Machines.

40 CFR Part 63 Subpart T (up to date as of 11/29/2022)  
National Emission Standards for Halogenated Solvent Cleaning

40 CFR 63.463(b)(2)

- (i) Employ one of the control combinations listed in table 2 of this subpart or other equivalent methods of control as determined using the procedure in § 63.469, equivalent methods of control.

**Table 2 - Control Combinations for Batch Vapor Solvent Cleaning Machines With a Solvent/Air Interface Area Greater than 1.21 Square Meters (13 Square Feet)**

Option	Control combinations
1	Freeboard refrigeration device, freeboard ratio of 1.0, superheated vapor.
2	Dwell, freeboard refrigeration device, reduced room draft.
3	Working-mode cover, freeboard refrigeration device, superheated vapor.
4	Freeboard ratio of 1.0, reduced room draft, superheated vapor.
5	Freeboard refrigeration device, reduced room draft, superheated vapor.
6	Freeboard refrigeration device, reduced room draft, freeboard ratio of 1.0.
7	Freeboard refrigeration device, superheated vapor, carbon adsorber.

**Violation 5: Degreaser is powered off on weekends.**

This was a miscommunication due to the supervisor being on vacation. The degreaser’s chiller unit and condensation coils are powered on at all times except for maintenance.

Action items:

- Update shut down directions to communicate this with necessary employees.

**Violation 6: No permit to install. Seven metal grinding machines that exhaust to a common stack that lacks a pre cleaner/fabric filter are being exhausting outside resulting in roof staining permit exemptions do not apply since there is not control.**

Upon investigation it was discovered that a filtration system is in place. However, it was discovered that the filtration system had failed. Maintenance and inspecting the filter system was missed on DAPCO’s part due to an oversight on training of new maintenance personnel. There

was a change of maintenance personnel in March 2022. After this discovery replacement parts were ordered. Inspecting and general maintenance was added to the Facility Preventative Maintenance schedule. This filtration system will be corrected by 12/31/2022.



Frequency	PM	Last Completed
Weekly	Water Filter Replacement (Monitor and Replace)	11/28/2022
Weekly	Inspect Floor Drains and Add Water When Needed	11/28/2022
Weekly	Pond level - Add Water When Needed (April-October)	10/15/2022
Monthly	Fire Pump Test	11/15/2022
Monthly	Light Inspection and Replacement	11/15/2022
Monthly	Emergency Lights Inspect and Replace	11/15/2022
Monthly	Grinder Filter Inspection	IN PROCESS
June 1	Replace HVAC Filters and clean intakes	6/14/22
July 1	Inspect and Clean HVAC Filters and Intakes	9/8/2022
Aug 1		
Bi-annual	Eyewash Station Solution Change-every 6 months-Due 9/2022	9/14/2022
July 1	Air Compressor Oil Change	7/11/22
May 1	Pond Fountain install and Remove	New Fountain to be ordered
Oct 1		
May 15	Outside Grounds Safety and Maintenance Inspection Railing, Sidewalks, Doors, Fencing, Parking Lots, Outdoor furniture	5/24/2022
May 1	Outdoor Cleanliness Inspections	
July 1	Trash Pickup, Round-up	8/23/2022
Aug 1		
Oct 1	Winter Preparation Plow on Track, Snowblower Maintenance, Salt Supplies	10/1/22
Oct-May	Snow Removal and Sidewalk Salt (as needed) Between 600am and 430pm	ongoing

