

# ANDRONACO INDUSTRIES

September 22, 2023

Ms. April Lazzaro  
EGLE – Air Quality Division  
Grand Rapids District Office  
350 Ottawa Avenue, NW Unit 10  
Grand Rapids, MI 49503



**re: Andronaco Industries (SRN N5535)  
Violation Notice of May 15<sup>th</sup>**

Dear Ms. Lazzaro,

Andronaco Industries is in receipt of your Violation Notice of May 15<sup>th</sup> alleging a violation of PTI No. 109-13 special condition II.1 for exceeding the styrene content limits of resin mixtures and special condition VI.3a-e for a failure to calculate emissions of VOC and acetone.

Our responses to these violations are as follows:

PTI No. 29-20, FGPLANT3, Special Condition VI.3.a,d&e – Failure to properly calculate VOC and acetone emissions

PTI No. 29-20, FGPLANT3, Special Condition VI.3.b&c – Failure to properly track usage of resins and styrene content

PTI No. 29-20, FGFACILITY, Special Condition VI.3.f – Failure to maintain accurate 12-month rolling aggregate HAP emissions

PTI No. 29-20, FGFACILITY, Special Condition VI.4 – Failure to properly calculate styrene emission per-12-month rolling time period

Andronaco Industries has been maintaining production records that personnel believed was sufficient to show compliance with the PTI. The individuals maintaining these records do not have the experience that was required to create this documentation. Unfortunately, after a review of the records, we have updated our records to reflect the information required by the PTI. These records are attached. We created records going back to May 2022. We can go back further if you require.

We have also attached a facility-wide inventory of equipment identified by the permit status of each, either exempt or permitted. We've also attached a facility-wide potential-to-emit for styrene.

4855 Broadmoor Avenue SE, Kentwood, MI 49512 Ph. 616-554-1100 Fax 616-554-9304  
[www.andronaco.com](http://www.andronaco.com)

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I hope that the information provided is acceptable but please let me know if you have any questions and thank you for your time and cooperation in this matter.

Sincerely,



Colleen Bowden  
Environmental, Health & Safety Manager

CC: Jenine Camilleri, Enforcement Unit Supervisor

AQD, PO Box 30260, Lansing, MI 48909-7760