NYLOK

Ms. Kerry Kelly
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division (AQD)
Warren District Office
27700 Donald Court
Warren, MI 48092

September 19, 2022

Re: Response to Violation Notice dated August 29, 2022
Nylok, LLC (SRN: N5656)

Dear Ms. Kelly:

Nylok, LLC (Nylok) is submitting this letter in response to the violation notice (VN) dated August 29, 2022 from the Michigan Department of Environment, Great Lakes, and Energy (EGLE). In the VN letter, EGLE provides the following observations regarding coating lines routed to a regenerative thermal oxidizer (RTO) at our facility in Macomb, MI. The coating lines are regulated as part of Flexible Group "FG-COATINGLINEA" in Renewable Operating Permit (ROP) No. MI-ROP-N5656-2020.

Process Description	Rule/Permit Condition	EGLE Comments
FG-COATINGLINEA	FG-COATINGLINEA SC IV.1, FG-MACT MMMM SC III.1, and FG-MACT MMMM SC VI.4	Records allegedly show the RTO three-hour rolling and block average temperatures were less than 1,550 °F between August 18, 2021 and August 20, 2021
FG-COATINGLINEA	FG-COATINGLINEA SC VI.8, FG-MACT MMMM SC VI.4	Nylok allegedly failed to conduct PTE pressure sensor calibrations quarterly and leak checks monthly
FG-COATINGLINEA	FG-COATINGLINEA SC VII.5, FG-MACT MMMM SC VII.6.b	Nylok did not report the alleged RTO temperature excursion/ deviation that occurred August 18, 2021 – August 20, 2021

Nylok operates various coating and adhesive lines in accordance with Renewable Operating Permit (ROP) No. MI-ROP-N5656-2020 and is located at 15260 Hallmark Court in Macomb, Michigan. Eleven (11) permitted coating lines identified in flexible groups FG-COATINGLINEA and FG-MACT MMMM are controlled by the facility's PTE and RTO that are subject to the requirements of the *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* codified at 40 CFR Part 63 Subpart MMMM ("Subpart MMMM").

Response to Violation – RTO Temperature

EGLE alleges that the 3-hour rolling as well as 3-hour block average RTO combustion chamber temperature did not meet the minimum required temperatures on the dates of August 18, 2021 through August 20, 2021. Nylok's ROP requires a minimum 3-hour rolling average RTO temperature of 1,550 °F (FG-COATINGLINEA SC IV.1), and Subpart MMMM requires a minimum 3-hour block average RTO combustion chamber temperature based upon an established minimum operating limit from the performance test. Subpart MMMM was updated on July 8, 2020 to require performance tests once every 5 years; previously, the regulation only required an initial compliance test that would establish the RTO temperature limit.

The majority of RTO chamber temperature records over the past year are above 1,550 °F, and the unit operated below the minimum RTO combustion chamber temperature for only a portion of hours between August 18, 2021 – August 20, 2021. However, as EGLE alleges, the combustion chamber temperature did not appear to meet the minimum required temperatures on the following dates, and, further, the system did not alarm Nylok for approximately three (3) days from August 18, 2021 through August 20, 2021. Specifically, the 3-hour rolling averages were less than 1,550 °F between 12:50 PM on August 18, 2021 and 6:50 AM August 20, 2021.

Nylok has taken immediate corrective action and has adjusted the low temperature alarm set point to 1,600 °F to ensure the 3-hour average meets the required minimum temperature of 1,550 °F and also the temperature established during the most recent performance test. Additionally, Nylok is in the process of updating our facility Work Practice Plan (WPP) to ensure our procedures incorporate proper set points for the RTO combustion chamber temperature.

Nylok's performance tests from January 2016 and February 2021 indicate an RTO destruction efficiency of 97.7% and 97.8%, respectively; the limit in the ROP is 95%. Additionally, Nylok remains in compliance with the Subpart MMMM emission limit of 2.6 lb/gallon coating solids even if excluding control credit for the entire month of August, as a conservative measure.

Nylok will resubmit the annual ROP Certification of Compliance, Semiannual Monitoring and Deviation report, Compliance Assurance Monitoring (CAM) reports, and NESHAP Subpart MMMM semiannual report via U.S. EPA's Compliance and Emissions Data Reporting Interface (CEDRI) for the 2021 calendar year and reporting period July 1, 2021 through December 31, 2021 to include the alleged RTO temperature excursions and deviations that occurred from August 18, 2021 through August 20, 2021.

Response to Violation – Quarterly and Monthly Audits

Nylok sends the pressure measurement device (i.e., Magnehelic gage) off-site to be calibrated by a third party (International Certification Measurements, Inc.) on a semi-annual basis, with the most recent calibrations occurring on May 18, 2022, and August 25, 2022. As part of the calibration, an

accuracy audit is conducted. Additionally, Nylok has operated a redundant pressure gage at the PTE since the RTO was installed in January 2016.

EGLE alleges that Nylok has not been conducting quarterly pressure sensor calibrations; however, it is noted that there is not a requirement to conduct pressure sensor calibrations on a quarterly basis; rather, the requirement is to perform an accuracy audit at least quarterly that includes comparisons of sensor output to a calibrated pressure measurement device. Based upon recent audits, results from International Certification Measurements, Inc. indicate that the audit parameters were within acceptable ranges and in most cases, nearly exact to the reference value, without requiring an adjustment. Based on this information, the pressure gage data demonstrates ongoing conformance with the pressure drop recordkeeping to demonstrate that the PTE is operating properly. Regardless, Nylok is increasing the frequency of pressure gage accuracy audits to occur once every calendar quarter to align with the required frequency, with the next scheduled to occur on September 30, 2022.

Nylok has also taken immediate corrective action to update internal documentation/recordkeeping (i.e., CPMS Monthly Audit form) to track quarterly accuracy audits. Nylok will maintain documentation on file of each certified calibration and accuracy audit.

Additionally, EGLE alleges that Nylok has not been conducting monthly leak checks of pressure connections. Nylok's CPMS Monthly Audit form previously listed Leak Checks as part of the visual inspection requirement. Nylok visually inspects the Magnehelic gage on a daily basis and maintains records pursuant to the WPP. Nylok has taken immediate corrective action to update internal recordkeeping/documentation (i.e., CPMS Monthly Audit form) to indicate that Monthly Leak Checks must be conducted as part of a regulatory requirement and will reiterate this requirement to operations/maintenance staff.

We appreciate your close review of these matters and look forward to resolving these items as efficiently as practicable.

If there are questions regarding this response, please contact me at (586) 786-1503.

Sincerely,

Martin Lewis
General Manager
Nylok LLC

cc: Ms. Jenine Camilleri, EGLE – AQD

NYLOK

Mr. Christopher Ethridge, EGLE – AQD
Ms. Joyce Zhu, EGLE – AQD
Ms. Mary Mello, NTH Consultants, Ltd.

A Marmon/Berkshire Hathaway Company

15260 Hallmark Court Macomb, MI 48042 • Phone 586.786.0100 • Fax 586.786.0598
nylok.com