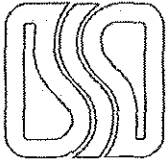


TS - Email



SEAVER FINISHING E-COAT DIV.

16900 Hayes Street
Grand Haven, Michigan 49417
Telephone (616) 844-4360
Fax (616) 844-4367



Mr. Tyler Salamasick
Environmental Quality Analyst
Air Quality Division
Department of Environmental Quality
350 Ottawa N.W. Unit 10
Grand Rapids, MI 49503

March 7, 2018

Dear Mr. Salamasick,

This correspondence serves to respond to the Notice of Violation (NOV) dated January 24, 2018 regarding use of a coating in our e-coat dip tank that exceeded our permit limit by 0.21 pounds of volatile organic compounds (VOC) per gallon (minus water) and the installation of a 0.95 mmBtu/hr natural gas fired rack burn off oven without a permit. Initially, we would like to thank you for extended the response date by 15 days to March 7, 2018 to accommodate previously scheduled travel.

As requested in the NOV, the following information is being provided to address the violations. This information is consistent with information provided to you during the unannounced compliance inspection conducted on January 5, 2018 and in follow up correspondence.

NOV Requested Actions:

- ***What corrective actions were necessary and initiated to correct the cited violations***

As discussed in your inspection report, permit modifications would be adequate to update the e-coat permit, PTI #397-55 and the rack burn off permit PTI #166-10 to correct these violations. This is based on the following information:

1. Following your analysis of the records of our coating usage, you determined that even using the highest recorded daily coating usage rate for the past two years per day, we did not violate the hourly VOC emission limit. This worst case usage rate was also applied for the entire year and we did not exceed the annual VOC emission limits. Therefore you

March 7, 2018

determined that we could request a modification to the permit to adjust the coating VOC pound per gallon (minus water) as applied. The coating is HAP and heavy metal free.

2. During your inspection, the rack burn oven that was not permitted was observed to be operating in compliance with all permit conditions. It is the same model and size as the other ovens and has equipment that allows it to operate in compliance. Had this been a single oven, it would have complied with specifications allowing for a general permit, however since there are three other ovens, we have requested a modification to the existing permit to add this oven.

Both permit applications requesting modifications were prepared and are being submitted today (hard copy - USPS) to the Air Quality Division Permit Section.

▪ ***What date did the violation occur***

The PPG coating has been used since the E-Coat line was installed and the rack burn off oven was just recently installed in June of 2017.

▪ ***Provide an explanation of causes and duration of the violations***

Our analysis of the causes and duration of the violations are as follows:

The E-coat line uses only one coating which is preblended. We believe there is confusion between the "as applied" vs. "as supplied" values. In the PPG coating technical literature it indicates:

"The VOC number is calculated as pounds per gallon minus water. Be sure to use the # VOC/gallon figure to calculate total solvent emissions from consumed gallons. (Ref: EPA Test Method 24) "

1. As directed by PPG, the coating VOC value of 0.17 pounds per gallon is used to calculate emissions from the coating as applied. This is also the EPA Test Method 24 value. The VOC (minus water) value of 0.48 pounds per gallon is the preblended coating as supplied. We believe that the EPA Method 24 value of 0.17 pounds VOC per gallon as applied could be compared more accurately to the permit limit of 0.27 pounds VOC per gallon (minus water) as applied. In this case there would not be a violation and is consistent with the coating records which were found to be well in compliance with hourly and annual emission limits.

Due the age of the permit, we have prepared a modification requesting the new coating be added to the permit and the permit limits indicating VOC values be adjusted accordingly. In recent discussion with PPG, an

March 7, 2018

environmental data sheet was provided which reported a new value of 0.53 pounds VOC per gallon (minus exempts) as supplied and 0.19 lb/gal actual VOCs (with water with exempts). This new value is still under the 0.27 pounds VOC per gallon (minus water) as applied limit and the hourly and annual limits.

2. As stated above, the new rack burn off oven is the same size and model to the two larger permitted ovens. It has a burner size of 0.95 mmBtu/hr. Due to a lack of understanding of the permit specifics, we believed the permit gave us permission to use rack burn off ovens on our site as long as we operated them in compliance with permit conditions. We did not clearly understand that the permit restricted us to only the three ovens listed. As was noted in the inspection report we operated the new oven in compliance and also installed the same type and size of stack as the other three ovens. All four ovens are only used to clean racks used in our E-Coat system. The ovens are natural gas fired and there are no HAPS, heavy metals or halogens in the coating or its residue left on the racks that is combusted in the ovens.

▪ ***Are the violations ongoing***

These are administrative issues which should be resolved with the processing of the permit applications requesting modification. The equipment will continue to be operated in compliance while the permit applications are being evaluated. No changes are expected to occur in operations or emission quality or quantity.

▪ ***Provide a summary of the actions taken or proposed to be taken to correct the violations***

Permit applications have been prepared and are being submitted today requesting modifications to the e-coat and rack burn off permits.

▪ ***What steps have been taken to prevent a reoccurrence and the dates by which these actions will take place***

We have gained a better understanding of our permits and the permitting requirements through this process. Going forward, we will evaluate any proposed process or equipment changes to determine permit or permit exemption applicability. We understand that air permits must be obtained prior to installation of equipment with the potential to generating emissions.

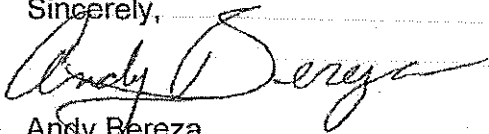
We retained an environmental consultant to assist us with preparation of the permit applications and we will use similar services to help us determine if a

March 7, 2018

permit is required for proposed equipment, as well as compliance assistance tools that the AQD have made available, including the Permit Exemption Hand Book and Surface Coating Calculation Fact Sheet and other website links.

Please do not hesitate to contact me if you have any questions on the above information or if you would like to review additional information related to this issue. I can be reached at 616-844-4360, Ext. 127 or at andy@seaverfinishing.com

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Bereza", written over a horizontal dotted line.

Andy Bereza

Operations Manager