

PREFIX

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Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division – Warren District
27700 Donald Court, Warren, Michigan 48092

Subject: Violation Notice dated June 26, 2023 for 3500 Joslyn Rd., Auburn Hills, MI – P0328

Dear AQD-Warren District,

Prefix Corporation is providing a written response to the Violation Notice dated June 26, 2023 regarding the facility located at 3500 Joslyn Rd., Auburn Hills MI.

Violation: Coating Booth #4 – Monthly VOC emission limit of 2,000 lb VOC/booth/month was exceeded in this booth. 2,271 lbs were reported as emitted from Booth #4.

Response: This violation occurred for the month of September 2022 due to the method of recordkeeping. The default method was to allocate the solvent purchased in a month to that month only. This only works if operations and purchases are consistent. In this case a large quantity of GRO1501 solvent was purchased in September 2022 which created an unreasonable usage of solvent per gallon of coatings used that month. Prefix subsequently reallocated the GRO1501 solvent for the months around September and resubmitted the emission calculations on 5/24/23 showing that the emissions for Booth #4 did not exceed 2,000 lb during September 2022. Prefix is modifying the recordkeeping spreadsheets so that they will automatically highlight cells that are approaching a violation of permit limit so this can be identified more quickly before a violation occurs in the future. The recordkeeping spreadsheets will be updated with the cell highlighting modifications by August 1, 2023.

Violation: Purge and clean-up operations - Usage of GRO1501 purge solvent and VOC laden wipes was reported inaccurately. Prefix used the total amount of GRO1501 solvent and VOC laden wipes purchased each month as the monthly.

Response: Prefix was using this method for accounting for the GRO1501 solvent usage as a conservative approach for reporting emissions. Since this method is not acceptable Prefix will implement a recordkeeping system to accurately determine the quantity of GRO1501 solvent usage at each booth. Prefix is currently developing this system and will have it in operation no later than September 1, 2023.

Please let me know if you have any questions.

Regards,



Kenneth J. Siuda

cc:

Jenine Camilleri
Enforcement Unit Supervisor at EGLE, AQD
P.O. Box 30260, Lansing, Michigan 48909-7760.