

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 P0361)
Violation Notice of May 15th**

Dear Ms. Lazzaro,

Andronaco Industries is in receipt of your Violation Notice of May 15th 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. 109-13, FGCOMPOLDING, Special Condition II.1

Through the years Andronaco has reformulated resin mixtures in response to customer quality requirements as well as new products being added to our portfolio of offerings. Unfortunately, personnel at the site have not always been aware of the requirements of our PTI to limit the styrene content of our batches. Andronaco will prepare and submit an application to change this limit to a limit that reflects the styrene content of current formulations. We will prepare and submit this application as soon as practicable, but no later than November 15, 2023. Let us know if this schedule is acceptable to EGLE.

PTI No. 109-13, FGCOMPOLDING, Special Condition VI.3a-e

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.

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Per your request, we have also conducted a facility-wide inventory of equipment and have identified the permitted or exempt status of each. The lone unresolved issue is whether the plastic sintering ovens and rotomolds requires a PTI as there are multiple exemptions that may apply, but none of them exactly.

Lastly, we are providing a facility-wide PTE for styrene demonstrating that the facility is a true minor for this HAP.

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