



Axalta Coating Systems, USA, LLC
400 N. Groesbeck Highway
Mt. Clemens, MI 48043

July 17, 2024

Mr. Adam Bognar
MIEGLE – AQD
27700 Donald Court
Warren, MI 48092-2793

**RE: VN dated June 26, 2024, related to AQD Inspection and Document Review RY2023
Axalta Coating Systems, LLC, Mt Clemens Plant – SRN A3569**

Dear Mr. Bognar:

Axalta Coating Systems (Axalta) is in receipt of a Violation Notice (VN) from the Michigan Department of the Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) dated June 26, 2024. The Violation Notice cites alleged violations of both Axalta's permit conditions and various state regulations related to operation of its resin dust collector (DC-8). The dust collector (DC-8) controls particulate matter (PM) emissions from three resin reactors (RR1, RR7, and RR8) during powder loading to these vessels.

In accordance with its Renewable Operating Permit (ROP) A3569 General Conditions (Certification & Reporting) for deviations that do not exceed emissions allowed under the ROP, Axalta first disclosed this occurrence to EGLE and EPA in its 2023 Annual Certificate of Compliance Report for RY2023, and then again on April 30th, 2024, during EGLE's annual site inspection and records review. As part of that review, Axalta provided EGLE with its raw data collected continuously in 15-minute intervals from IP21 for DC-8 dust collector. Axalta notes that since DC-8 exhaust was not operating, any pellet dust would have remained in the reactor vessel and no emission from DC-8 could have occurred.

Axalta's response below demonstrates the actions taken to prevent recurrence of failure to operate in the future. To ensure that dust collector DC-08 is maintained and properly operating during powder loading of resin reactors, Axalta initiated the following actions beginning July 2023:

1. Area Supervisors reviewed Standard Operating Procedure RES_A156 with Resin operators including the requirement to view magnahelic gauges and confirm vacuum before resin production and powder loading.
2. Installation of a visual indicator light was completed in the Resin area to alert operators when dust collector DC-8 is not operating. In addition to viewing the Magnahelic Gauge at the powder loading chute, operators now have a second visual indicator to confirm DC-8 is operating prior to powder loading. If the visual indicator alarm light is RED, the operators have been trained not to proceed with powder loading and to immediately notify area supervisor. April 30th, 2024,

a Resin Area Change Communication Form dated April 30th, 2024, related to the new Resin Dust Collector Alarm Light was circulated for review and training. On July 11, 2024, a supplemental Resin Area Change Communication Form was circulated for review and training.

3. Developed and implemented post shut down startup checklist to be used by Powerhouse and Maintenance for all emission control equipment including dust collector DC-08.

Axalta is committed to environmental protection and pollution reduction and takes its responsibility as a good steward of our environment seriously.

If you have any questions concerning this submittal, please let me know if I can be of further assistance.

Sincerely,

Axalta Coating Systems, LLC

Joseph Marecic
EHS & S Manager
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cc: Anthony Kashat; EHS&S Specialist
Jonathan Scheibe; Senior Director, Global EHS
Amit Shah; VP & Associate General Counsel
Stephen Zervas; Trinity Consultants
William Haak; esq