



H.B. Fuller Company
North American ASC
2727 Kinney N.W.
Grand Rapids, Michigan 49544

September 22, 2017

Mr. Adam Shaffer
Environmental Quality Analyst
MDEQ, Air Quality Division
State Office Building
350 Ottawa Avenue, NW Unit 10
Grand Rapids, MI 49503-2341



Subject: Violation Notice

Mr. Shaffer,

This letter is confirming our telephone and email conversations yesterday during which you granted H.B. Fuller an extension until October 20, 2017, to completely respond to the Violation Notice.

The attached table summarizes our response to the cited violations. Regarding the additional items requested, we will have the Preventative Maintenance / Malfunction Abatement Plan updated, MAERS Report resubmitted and the applicable exemptions for the additional pieces of equipment completed by October 20, 2017.

So far we have identified that the temperature exceedance on emission unit EUMHTMIXER (PIT No. 275-04C Special Condition VI.4.e) that occurred on April 22, 2017 happened during a non-solvent containing batch. Therefore, the potential to emit volatile organic compounds was not present.

We also believe that our indoor tank farm meets exemption R 336.1284(2)(i) which states that storage, mixing, blending, or transfer operations of volatile organic compounds or non-carcinogenic liquids in a vessel that has a capacity of not more than 40,000 gallons where the contents have a true vapor pressure of not more than 1.5 psia at the actual storage conditions. We have reviewed the safety data sheets for the materials stored in those vessels and have determined that all vapor pressures are below 1.5psia. Please see the attached SDSs for reference. We have also confirmed that all tanks in the southern tank farm have a capacity less than 40,000 gallons and the largest tank being 12,000 gallons.

Requirement	PTI No. 275-04C Incomplete Records	PTI No 275-04C Special Condition VI.4.e
Dates the violations occurred	January 2009 to September 21, 2017.	April 22, 2017
Cause of the violations	The air permit tracking spreadsheet was never set up to record the daily usage of solvent usage during vessel cleanout events.	The cause of the temperature exceedance has yet to be determined.
Duration of the violations	The duration of the violation is difficult to determine. Our best estimate would be eight years.	100 minutes
Weather the violations are ongoing	We are in the process of implementing the necessary corrective action to correct this and expect to have everything completed by October 20, 2017.	The violation is not on going.
Summary of actions taken to correct the violations	A spread sheet has been developed to track the amount and type of solvent used during vessel cleaning events. Solvents used in producing batches are currently inventoried in our business management software (SAP).	Batch tickets for the day of the exceedance were reviewed and it was determined that no solvents were used in production that day. Therefore, volatile organic compounds were not emitted. Additional data as to what caused the event is still being investigated. We are retraining operators in the appropriate response to temperature alarms.
Dates which the actions will take place	The manual tracking spreadsheet was put in place on September 21, 2017. Better tracking of solvents used in producing batches will be complete by October 20, 2017.	We propose to have corrective action in place by October 20, 2017.
Steps to prevent reoccurrence	We are vessel cleanout solvent inventory control in SAP the date of completion has yet to be determined. We are also correcting our air permit tracking spreadsheet with updated emissions modeling and calculations.	We are updating our preventative maintenance/malfunction abatement plan and retraining of operators to respond to temperature alarms.

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H.B. Fuller thanks you for your cooperation in granting us the extension. If you have any questions or need additional information, please contact me.

Regards,

A handwritten signature in black ink, appearing to read "Tim Hula". The signature is fluid and cursive, with the first name "Tim" being more prominent than the last name "Hula".

Tim Hula
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