

October 16th, 2024

Mariah Scott  
Environmental Quality Analyst  
EGLE, AQD, Kalamazoo District  
7953 Adobe Rd.  
Kalamazoo, MI 49009

Dear Mariah:

We are responding by 10/17/24 to the following violations in SRN B8786 in reference to your visit on 8/9/24.

Process Description	Rule/Permit Condition Violated	Comments
FGPARTICULATE	MI-ROP-B8786-2020a, Special Conditions FGPARTICULATE VI. 1. and Appendix 3	The last two years of maintenance records for silos and mill maintenance had some missing requirements. Mill records provided were missing the check of "Check bag filters for leaks." Several mill maintenance logs include unsigned tasks, with no explanation as to why they were not completed. Silo maintenance is required semiannually, but maintenance records indicate they were not maintained often enough for permit requirements.
FGCOLDCLEANERS	MI-ROP-B8786-2020a, Special Condition FGCOLDCLEANERS IV. 4. R 336.1707(3)(a)(ii)	EUCOLDCLEANER is an agitated unit without a mechanically assisted lid.

#### 1. FGPARTICULATE

- Date of Violation: Year 2022 to September 2024
- Cause and Duration of Violation: Maintenance manager staffing changes. In an effort to reduce maintenance workload, the previous maintenance manager changed the semi-annual silo preventative maintenance (PM) to an annual PM. At the time, the maintenance manager, who was new to the position, did not understand the semiannual PM was a requirement of our air permit. Additionally, based on staffing challenges, some of the PMs were not performed. Mill PMs were performed on a semiannual basis during 2023 and 2024, which were documented in Sekisui's computerized maintenance management system (CMMS). However, not all of the checklists were scanned and saved.
- Violation Status: Corrected. In 2023, after the respective maintenance manager left Sekisui Voltek, our current maintenance manager returned to the position but did not identify that the silo PMs had been changed from semiannual to annual. The silo PMs have been updated in the CMMS to semiannual inspections.

- d. Completed Actions: Silo PMs completed in September 2024. All PMs are now on a fixed schedule in the PM system for semi-annual completion.
- e. Proposed Actions: The Maintenance Manager will verify the checklist to confirm all tasks have been completed, then initial and pass to MRO Coordinator. The MRO Coordinator will scan the checklist onto our server for filing of documentation.
- f. Steps to Prevent Reoccurrence: Hard copy will be passed on to EHS. EHS will document completion.

## 2. FGCOLDCLEANERS

We believe there is a misunderstanding related to the large cold cleaner with the pump agitation. As documented in our renewable operating permit (ROP) emission unit description table, the large cold cleaner (EUCOLDCLEANER) was installed in 1974. Pursuant to Michigan Part 6 rules, cold cleaners, subject to Rule 611, are existing if they were placed into operation before July 1, 1979. As Rule 611 applies to all existing cold cleaners and does not differentiate between agitated or non-agitated cleaners, EUCOLDCLEANER is not subject to mechanically assisted lids.

The Part 6 (existing) and Part 7 (new) cold cleaner regulations are both identified in Sekisui's ROP under FGCOLDCLEANERS. FGCOLDCLEANERS description, defines existing cold cleaners as those "placed into operation prior to July 1, 1979," and new cold cleaners are defined as those "placed into operation on or after July 1, 1979."

The alleged violation indicating that EUCOLDCLEANER is being operated without a mechanically assisted lid cites FGCOLDCLEANERS IV.4 R 336.1707(3)(a), which refers to Part 7 for new cold cleaners. Special condition IV.4 reads as follows:

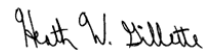
The cover a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (R 336.1707(3)(a))

As EUCOLDCLEANER is existing and subject Part 6 not Part 7 rules it is not subject to special condition IV.4, and the cold cleaner is not required to have a mechanically assisted lid. Although the existing cold cleaner is in compliance with the ROP and Part 6 rules, Sekisui has determined that we do not have a need for agitation of the cold cleaner solvent. To avoid confusion in the future, Sekisui will likely purchase a new cold cleaner and retire/decommission the old cold cleaner.

- a. Date of Violation: not applicable
- b. Cause and Duration of Violation: not applicable, the cited violation appears to be a misunderstanding of the date of installation of the EUCOLDCLEANER
- c. Violation Status: not applicable
- d. Completed Actions: not applicable.
- e. Proposed Actions: not applicable
- f. Steps to Prevent Reoccurrence: not applicable

We hope this response meets the expectation of your request. If you have any comments or questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Heath W. Gillette".

Heath W. Gillette  
Director, QEHS  
Sekisui Voltek

CC: Jenine Camilleri, Enforce. Unit Sup. - EGLE  
Jeff Budd, CFO -Sekisui Voltek  
Bill Odisher, Sr. Dir. Ops. - Sekisui Voltek  
Don Ostrander, Maint. Mgr. - Sekisui Voltek  
Stephanie A. Jarrett, P.E., Senior Environmental Engineer – Fishbeck  
Jacob J. Abair, Senior Chemical Engineer - Fishbeck