



Conformance
Coatings &
Prototype, Inc.

Attention:

State of Michigan Department of Environment, Great Lakes and Energy,

Warren District

CC: Ms. Jenine Camilleri

In response to Violation Notice N0871:

Conformance Coating and Prototype Inc has received notice that the facility is not in compliance of the following parts of the Federal Clean Air Act.

Per the e-mail dated 7/7/2020 from Shamim Ahammod:

"The facility was not compliance with the PTI No. 75-04, FGPPCOATING SC 1.1a, SC 1.1b, SC 1.1c and SC 1.1d because VOC emission was exceeded the permit limit (SC 1.1a) and the facility was not keeping the record per the permit requirements (SC 1.1b, 1.1c. and 1.1d). Please see the (below) screenshot. "

SC	Pollutant	Equipment	Emissions record from January through December 2019	Limit	Time Period	Rule/Permit Condition Violated	Compliance
1.1a	VOCs	FGPPCOATING	The records shows that actual emissions of VOC from the FGPPCOATING process equipment are 10,808 tpy at the end of December 2019.	30.0 tpy	12-month rolling time	PTI No. 75-04 FGPPCOATING SC 1.1a	Non-compliance
1.1b	VOCs	Each Individual Emission Unit Portion of FGPPCOATING when coating of plastic business machine parts.	The permittee did not keep the record in terms of VOC (lb/(gallon of solids applied) as required by the permit.	11.96 pounds per gallon of solids applied*	Calendar month	PTI No. 75-04 FGPPCOATING SC 1.1b and 1.11.	Non-compliance
1.1c	VOCs	Each Individual Emission Unit Portion of FGPPCOATING.	The permittee did not keep the record to demonstrate compliance as required by the permit.	2000 pounds	Calendar month	PTI No. 75-04 FGPPCOATING SC 1.1c and 1.11.	Non-Compliance
1.1d	VOCs	Each Individual Emission Unit Portion of FGPPCOATING.	The permittee did not keep the record to demonstrate compliance as required by the permit.	10.0 tpy	12-month rolling	PTI No. 75-04 FGPPCOATING SC 1.1d and 1.11.	Non-Compliance

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JUL 23 2020

Air Quality Division
Warren Office



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We have revised our reporting to reflect accurate VOC emissions in the attached Excel Spreadsheet. The specific concerns are addressed in the following excerpt.

CCP 2019 Compliance

TOTAL	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Total lbs	Total Tons
VOC (lbs)*	747.6	1100.7	972.7	995.6	711.6	622.7	876.1	857.9	811.7	1237.9	1213.0	377.1	10524.6	5.2623
GAL (Qty Each)	134.5	184.0	164.5	177.2	129.3	99.3	144.9	138.4	195.8	210.6	258.5	74.3	1911.0	0.9555
VOC (Lbs / Gal)**	5.6	6.0	5.9	5.6	5.5	6.3	6.0	6.2	4.1	5.9	4.7	5.1	66.9	0.0334
WGT (lbs)	1000.7	1326.5	1240.2	1275.1	966.7	758.3	1036.5	943.3	954.0	1579.6	2091.4	587.3	13759.7	6.8798
HAP (lbs)	93.7	78.7	170.667	155.2	112.6	46.5	90.3	49.2	101.8	174.9	187.3	108.405	1369.2	0.6846
Tons / Month	1.0	1.3	1.3	1.3	1.0	0.8	1.1	1.0	1.0	1.6	1.9	0.6		13.8157
	Required		Actual		Required		Actual		Required		Actual			
*Ref. 1.1A	< 30 Tons per year		5.2623 Tons / year		Ref 1.1D		Individual Month total < 10 tons		< 1 Ton / month					
*Ref. 1.1C	< 2000 lb per mo		< 2 Tons / month											
**Ref 1.1B	< 11.96 lbs / Gallon		< 6.5 lbs / Gallon											

Ref Section 1.1A: Requirement is that VOC emissions must be less than 30 tons per year.
Actual emissions as shown are 13.8 tons per year.

Ref Section 1.1B: Requirement is that VOC emissions must be shown in lbs / gallon and be less than 11.96 lbs / gallon per month.
Actual emissions are less than 6.5 lbs / gallon for all individual months.

Ref Section 1.1C: Requirement is that VOC emissions must be less than 2000 lb per calendar month.
Actual emissions do not exceed 1300 lbs for any calendar month as shown.

Ref Section 1.1D: Requirement is that VOC emissions must be less than 10 tons per individual month
Actual emissions do not exceed 1 ton per month.

We have additionally revised our reporting to resolve HAP violations as shown in the following excerpt:

HAP by substance weight in tons																	
		Chromium Compounds	Monobutyl Ether Diethylene Glycol 112345	Monobutyl Ether Ethylene Glycol 111762	Monomethyl Ether Propylene Glycol 107982	Ethyl Benzene 100414	Ethylene Glycol 107211	Formaldehyde 5000	Hexamethylene 1,6 diisocyanate 822060	Methyl Ethyl Ketone 78933	Nickel	Nickel Oxide	Toluene 108883	2,4 Toluene Diisocyanate 58484g	Xylene 1330207	Total HAP (lbs)	Total HAP (Tons)
1	Jan	0.0000	0.0000	0.0002	0.0000	0.7817	0.0000	0.0000	0.0020	0.0312	0.0000	0.0000	0.1556	0.0000	8.5275	93.7043	0.0469
2	Feb	0.0000	0.0000	0.0000	0.0000	3.3257	0.0000	0.0000	0.0031	0.0200	0.0000	0.0000	0.0011	0.0000	13.3474	78.6557	0.0393
3	Mar	0.0000	0.0000	0.0000	0.0000	11.4788	0.0000	0.0000	0.0008	0.0487	0.0000	0.0000	0.2777	0.0000	43.3581	170.6670	0.0853
4	Apr	0.0000	0.0000	0.0000	0.0000	8.0018	0.0000	0.0000	0.5760	0.0431	0.0000	0.0000	0.1368	0.0000	39.9712	155.2009	0.0776
5	May	0.0000	0.0000	0.0000	0.0000	2.8463	0.0000	0.0000	0.3544	0.0353	0.0000	0.0000	0.0389	0.0000	15.3899	112.6029	0.0563
6	Jun	0.0000	0.0000	0.0000	0.0000	0.6924	0.0000	0.0000	0.0019	0.0155	0.0000	0.0000	0.0001	0.0000	5.5909	46.4510	0.0232
7	Jul	0.0000	0.0000	0.0000	0.0000	6.4250	0.0000	0.0000	0.0000	0.0221	0.0000	0.0000	0.0800	0.0000	27.8033	90.3103	0.0452
8	Aug	0.0000	0.0000	0.0000	0.0000	2.8467	0.0000	0.0000	0.0000	0.0147	0.0000	0.0000	0.1220	0.0000	13.2585	49.2229	0.0246
9	Sep	0.0000	0.0000	0.0000	0.0000	2.8367	0.0000	0.0000	5.0665	0.0359	0.0000	0.0000	0.1175	0.0000	16.9975	101.7883	0.0509
10	Oct	0.0000	0.0000	0.0012	0.0000	12.5745	0.0000	0.0000	1.2404	0.0352	0.0000	0.0000	0.3616	0.0000	67.7940	174.9045	0.0875
11	Nov	0.0003	0.0036	0.0000	0.0000	10.4829	0.0000	0.0000	0.6424	0.0185	0.0099	0.0010	0.3695	0.0000	55.8377	187.3183	0.0937
12	Dec	0.0000	0.0000	0.0012	0.0000	0.0007	0.0000	0.0000	0.0000	0.0100	0.0000	0.0000	0.3614	0.0000	0.0030	108.4051	0.0542
13	Total lbs YTD	0.0003	0.0036	0.0027	0.0000	62.2932	0.0000	0.0000	7.8875	0.3298	0.0099	0.0010	2.0222	0.0000	307.8789	1369.2314	
14	Total Tons YTD*	0.000000	0.000002	0.000001	0.000000	0.031147	0.000000	0.000000	0.003944	0.000165	0.000005	0.000001	0.001011	0.000000	0.153939		0.6846
15		Required			Actual												
16	*Ref. 2.1A	Individual HAP < 9 tons / year			< 0.2 Ton / Year												
17	*Ref. 2.1B	Aggregate HAPs < 22.5 Tons			< 1 Ton / Year												



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Ref Section 2.1A: Requirement is that individual HAP must be less than 9 tons / year

Actual individual HAP is less than 0.2 tons / year

Ref Section 2.1B: Requirement is that aggregate HAP must be less than 22.5 tons / year

Actual aggregate HAP is less than 1 ton / year.

Having addressed the individual concerns that were noted in the violation notice, Conformance Coating and Prototype submits the attached spreadsheet to show that there are no violations at this facility, and that this facility is in complete compliance with the Federal Clean Air Act.

Jeff Jones (JJ)

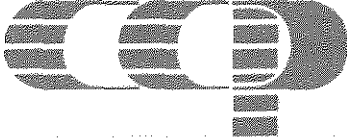
President

Conformance Coatings & Prototype, Inc.

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CCP 2019 Compliance

TOTAL	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Total lbs	Total Tons
VOC (lbs)*	747.6	1100.7	972.7	995.6	711.6	622.7	876.1	857.9	811.7	1237.9	1213.0	377.1	10524.6	5.2623
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GAL (Qty Each)	134.5	184.0	164.5	177.2	129.3	99.3	144.9	138.4	195.8	210.6	258.5	74.3	N/A	N/A
Tons / Month	0.9	1.3	1.2	1.2	0.9	0.7	1.0	0.9	0.9	1.5	1.7	0.5		12.8602

	Required	Actual
*Ref. 1.1A	< 30 Tons per year	5.2623 Tons / year
*Ref. 1.1C	< 2000 lb per mo.	< 2 Tons / month
**Ref. 1.1B	< 11.96 lbs / Gallon	< 6.5 lbs / Gallon

	Required	Actual
Ref. 1.1D	Individual Month total < 10 tons	< 1 Ton / month

Total VOC (lbs) BY LINE

Lbs	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	Total lbs	Total Tons
LINE 1	36.545	19.055	45.844	42.861	33.755	11.775	19.625	12.717	34.383	75.255	54.915	48.635	435.365	0.218
LINE 2	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LINE 3	54.631	49.008	130.844	122.391	51.574	32.803	90.372	50.004	527.939	374.210	470.408	189.419	2143.601	1.072
LINE 4	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
LINE 5	135.556	58.691	93.817	32.750	31.990	101.658	61.843	140.898	115.578	64.898	48.290	29.420	915.387	0.458
LINE 6	517.739	971.559	701.043	794.070	594.240	474.091	700.693	633.365	133.790	707.450	406.584	107.208	6741.830	3.371
LINE 7	3.099	2.384	1.192	3.576	0.000	2.384	3.576	20.962	0.000	16.126	232.759	2.384	288.442	0.144
	747.570	1100.696	972.740	995.648	711.559	622.711	876.108	857.946	811.689	1237.938	1212.956	377.065	10524.625	5.262

GALLONS BY LINE (Each)

	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	12 MOS total
LINE 1	10	5.85	14.6	13.65	10.75	3.75	6.25	4.05	10.95	14.9	8.75	6.75	110.25
LINE 2	0	0	0	0	0	0	0	0	0	0	0	0	0
LINE 3	10.44	10.8	26	28.05	12.5	7.3	19.25	9.5	83.35	71.9	81.05	40.3	400.44
LINE 4	0	0	0	0	0	0	0	0	0	0	0	0	0
LINE 5	21	8.95	12.3	5	5	12.05	9.1	24.25	17.5	9.75	9.25	5	139.15
LINE 6	92.45	157.85	111.3	129.71	101	75.67	109.52	97.3	84	111	78.95	21.75	1170.5
LINE 7	0.65	0.5	0.25	0.75	0	0.5	0.75	3.25	0	3	80.5	0.5	90.65
	Total Gallons												1910.99

HAP by substance weight in tons

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