

July 31, 2024

Ms. April Lazzaro  
EGLE – Air Quality Division  
Grand Rapids District Office  
350 Ottawa Avenue, NW Unit 10  
Grand Rapids, MI 49503

***re: Lakeland Monroe Group – Plant 2 (SRN N7645)  
Violation Notice of July 9<sup>th</sup>***

Dear Ms. Lazzaro,

Lakeland Monroe Group Plant 2 is in receipt of your Violation Notice of July 9<sup>th</sup> alleging a violation of PTI No. 224-06A for multiple special conditions.

Our responses to these violations are as follows:

Coating Line 5 – PTI No. 224-06A, EU-Coatline-05, Special Condition VI.5 – Failure to calculate emissions of isopropyl alcohol use.

Lakeland Monroe Group Plant 2 has recently begun using isopropyl alcohol to wipe down parts prior to the application of coatings on Line 5. As you probably know, there have been multiple changes in management at the facility in the past and our new management was not as versed in the conditions of our air permit. We are now aware that we must be tracking the use of isopropyl alcohol and have set up a reporting system to make sure our consultant who maintains our records can incorporate this usage into our monthly records. Please be aware that the difference between actual emissions and the emission limit is more than enough to account for the additional emissions without the need for a permit amendment.

Coating Line 4 – PTI No. 224-06A, FG-Coatlines, Special Condition IV.3 – Cure oven temperature above 194 °F.

The set point on the temperature of our curing ovens is 180 °F. The controls system on our ovens ramps up temperature until the desired temperature of 180 °F is reached. The control system will typically overshoot the set point and will eventually settle down to the desired temperature. A review of our temperature charts indicated that there were very short excursions above 194 °F before retreating to 180 °F. In order to eliminate this condition that is inherent to the system, we have elected to reduce the oven temperature set point to 175 °F. This will insure that the very short period where the oven is above 194 °F will be eliminated.

Coating Line 1 and 4 – PTI No. 224-06A, FG-Coatlines, Special Condition VI.3 – Failure to calculate emissions of isopropyl alcohol use.

As mentioned above, Lakeland Monroe Group Plant 2 has recently begun using isopropyl alcohol to wipe down parts prior to the application of coatings. We have set up a reporting system to make sure our consultant who maintains our records can incorporate this usage into our monthly records. As with the same issue on Line 5, the difference between actual emissions and the emission limit is more than enough to account for the additional emissions without the need for a permit amendment.

All coating lines combined – PTI No. 224-06A, FG-Coatlines, Special Condition I.7 – Exceeded daily xylene emission limit on 1 day.

This exceedance was a result of unusually high usage of paint P678. The program where this coating is used is being phased out and usage of P678 is currently less than one third of the previous volume. We don't anticipate a scenario where xylene emissions will exceed our daily limit.

All coating lines combined – PTI No. 224-06A, FG-Coatlines, Special Condition I.8 – Exceeded daily hexamethylene diisocyanate limit on 66 days.

Most of these exceedances were the result of the usage of paint P614 which includes a particularly high volume of catalyst (2.05:1) SL10. The environmental data sheet for this catalyst lists the hexamethylene diisocyanate content of between 0.1% and 1.0%. For the purposes of recordkeeping, we have assumed that the hexamethylene diisocyanate content was the maximum of this range of 1.0%. We have contacted our supplier to get some clarity on the hexamethylene diisocyanate content of SL10. We solicited and received a letter from them indicating the actual hexamethylene diisocyanate content is actually 0.1266% (attached). We've reassessed emissions of hexamethylene diisocyanate and the total number of exceedances has been reduced from 66 to 33 days (revised records attached). To avoid further exceedances, our consultant has created a tool for us to use where we can calculate hexamethylene diisocyanate emissions when we are planning production volumes. We will implement controls on these emissions by limiting the amount of coating in a single day to avoid a recurrence.

Coating Line 4 – PTI No. 224-06A, FG-Coatlines, Special Condition I.10 – Exceeded Part 6 Volatile Organic Compound Coating content limit on 28 days.

All these exceedances were the result of the usage of coatings P741 and P748. Moving forward, P741 will now be used exclusively on Line 1 which is not subject to the Part 6 VOC coating content limit. Similarly, P748 will now be used exclusively on Line 5 which has an RTO for controls. These two actions will ensure the Part 632 exceedances will no longer occur.

You have also asked for an evaluation of whether the new washer line that is being constructed requires a permit-to-install. We believe that this installation is exempt from permitting per Rule 281(2)(e) for the following:

- ◆ Equipment used for washing or drying materials, where the material itself cannot become an air contaminant, if no volatile organic compounds that have a vapor pressure greater than 0.1 millimeter of mercury at standard conditions are used in the process and no oil or solid fuel is burned.

The water in the washer line will be heated by natural gas and the parts being washed cannot become an air contaminant. The materials used in the washer include a dilute solution of citric acid which is a solid and a very dilute concentration of a surfactant (0.03% – 0.07%) whose vapor pressure is extremely low. This installation also meets the exemption found at Rule 281(2)(k) for aqueous parts washers.

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,



Fernando Fernandez  
Plant Manager

