



May 23, 2024

Ms. April Lazzaro
Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division
Grand Rapids District Office
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2316

c. Jenine Camilleri, Enforcement Unit Supervisor

Re: Sparks Belting Violation Notice Response

Dear Ms. Lazzaro:

Sparks Belting Company (Sparks), SRN P1156, submits this letter in response to the May 3, 2024, Violation Notice (VN) to document the corrective actions taken to address a failure in meeting recordkeeping requirements associated with the use of an alternate purge solvent. The VN requested specific information be submitted with the response, which follows.

Dates the violations occurred

In November 2021, Sparks switched to use a new, comparable purge solvent to replace the Thermaclean gun flush used in EU-URETHANE equipment. Chemical composition data for the new purge material was not documented per Permit to Install (PTI) 182-20, FG-BELTPRODUCTION Special Condition (SC) VI.2, and material use data was not maintained or incorporated into the rolling 12-month emissions calculations for volatile organic compounds (VOC) or hazardous air pollutants (HAP) per FG-BELTPRODUCTION SC VI.3 and FGFACILITY SC VI.3, respectively, from November 2021 through May 2024.

Explanation of the causes and duration of the violations

The use of an alternate purge solvent without proper documentation and recordkeeping was discovered during a facility inspection by the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) on March 27, 2024. Complete information was not documented on the chemical content of the alternate solvent and usage information was not maintained and incorporated into VOC and HAP emission records. The violation occurred from November 2021 until May 2024.

The change in solvent without appropriate recordkeeping updates occurred due to lack of understanding and knowledge transfer gaps after changes in responsibilities of Sparks manufacturing and environmental personnel. Prior to the change in solvent, monthly usage, and associated rolling 12-month emissions records had been maintained in a compliance spreadsheet. During the switch to the alternate purge solvent, records of the alternate solvent usage and associated emissions were not incorporated in the spreadsheet because of the misunderstanding of recordkeeping requirements.

Sparks Belting Company, Inc
5005 Kraft Ave SE STE A
Grand Rapids, MI 49512

Tel 1-(800) 451-4537
customerservice@sparksbelting.com
www.sparksbelting.com

Fax: 1-(800) 338-2358



The chemical content of the alternate solvent is consistent to the Thermaclean previously used. The use of the alternate solvent is expected to have contributed a comparable amount of annual VOC and HAP emissions as in past years of operation, which are minimal (less than 100 pounds per year VOC emissions) because of the low vapor pressure of the purge solvent, the use of purge solvent at ambient temperature, and the prompt collection and containerization of the used purge. Emissions from the use of an alternate purge solvent are not anticipated to have threatened the PTI 182-20 emission limits.

Status of violations

Sparks plans to compile documentation and expand the compliance spreadsheet to support flexibility to use either the alternate purge solvent or Thermaclean starting in June 2024. Usage and associated emission records will be maintained in the compliance spreadsheet. Efforts are currently underway to remedy the historical recordkeeping gap associated with purge solvent use by incorporating chemical composition data for the alternate purge solvent and estimating worst-case monthly usage and associated emissions for the period of November 2021 through May 2024 using purchasing records or other operational information in conservative manner.

Corrective actions and completion dates

To address the use of an alternate purge solvent without documentation or recordkeeping updates, Sparks has contracted Barr Engineering Co. (Barr) for assistance. Sparks and Barr have taken or will take the following actions:

- May 21, 2024
 - Obtain chemical composition documentation for the alternate purge solvent to support flexibility to use it or Thermaclean for EU-URETHANE.
- June 7, 2024
 - Obtain updated supplier information for chemical composition of all materials used and update the compliance spreadsheet, as necessary.
- June 7, 2024
 - Environmental compliance and recordkeeping training implemented for environmental and appropriate production personnel on monthly recordkeeping requirements and procedures to evaluate the proposed use of a new material before implementation.
- June 28, 2024
 - Corrections/updates of recordkeeping within the historical compliance spreadsheets to track usage and calculate alternate purge solvent contributions to VOC and HAP emissions based on purchasing records or conservatively estimated historical usage. Incorporate expanded recordkeeping input for current and future use of Thermaclean and/or alternate purge solvent in the compliance spreadsheet for 2024.

Steps being taken to prevent a reoccurrence

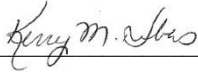
To avoid recurrence of the use of a new material resulting in recordkeeping and emission calculations errors, the recordkeeping compliance spreadsheet will be updated to indicate critical monthly data entry requirements. In addition, training



for environmental and appropriate production personnel will be implemented and maintained regarding monthly recordkeeping requirements and proper procedures to evaluate the proposed use of a new material before implementation.

Please contact Brian Greenwald of Barr at bgreenwald@barr.com or (616) 512.7012 or Jim Swainston jrsuainston@sparksbelting.com or (616) 464-6463 of Sparks Belting , with any further questions or to discuss this VN response in more detail.

Sincerely,



Name: Kerry Hubers

Title: General Manager

Sparks Belting Company