



## **West Michigan Flocking & Assembly, LLC**

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September 18, 2014

Ms. Dorothy Bohn  
MDEQ – Air Quality Division  
Kalamazoo District Office  
7953 Adobe Road  
Kalamazoo, MI 49009-5025

**re: West Michigan Flocking & Assembly, LLC (SRN A6600) Violation Notice**

Dear Ms. Bohn,

West Michigan Flocking & Assembly LLC is in receipt of your Violation Notice of August 29<sup>th</sup> alleging a violation of PTI 19-05 permit requirements concerning spray booth filters, HVLP spray gun test caps and required records.

You have requested that actions be initiated to correct the alleged violations and also have requested a written response by September 19<sup>th</sup>. You have indicated that the written response should include the dates that the violations occurred, an explanation of the cause and duration of the violation, whether the violation is ongoing, a summary of the actions that have been taken and are proposed to be taken to correct the violation and that dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

Regarding the spray booth filter that were installed with gaps allowing particulate to be emitted, we have purchased and have installed wider (48") spray booth filter material that covers the entire width of each spray booth. The filter material is cut to 68" lengths to ensure there are no gaps between the filter and the edges of the spray booth. Employees have been informed of this requirement.

We also have purchased test caps for the spray guns and they are now available for pressure testing.

Lastly, I emailed the required records to you on August 28<sup>th</sup>. Per your email of August 30<sup>th</sup>, those records seem to indicate there are 3 months where it appears the facility did not operate at all. Please note that the air permit records and associated material usage is based on material purchases. The months where it appears the facility did not operate were months where there were no adhesive purchases. This is due to our

adhesive supplier being unable to supply adhesive during certain months. This requires that we purchase additional materials leading up to these months which leads to overestimating emissions during these high purchasing months, i.e., October and November 2013 emissions are high based on the unavailability of adhesives in December 2013.

In order to improve our monthly emissions estimate, we will be conducting a physical inventory of our adhesives and cleanup materials at the end of each month and incorporate the inventory into our material usage estimate. This will eliminate zero emissions adhesive months as well as apparent exceedances of the 2,000 pound/month VOC limit.

Please let me know if you have any questions and thank you for your time and cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melvin Fox', with a long horizontal flourish extending to the right.

Melvin Fox  
President

cc: Ms. Mary Douglas