



West Michigan Flocking & Assembly, LLC

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March 13, 2017

Ms. Amanda Chapel
MDEQ – Air Quality Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009-5026



**re: West Michigan Flocking & Assembly (SRN A6600)
Violation Notice of February 23rd**

Dear Ms. Chapel,

West Michigan Flocking & Assembly (WMF&A) is in receipt of your Violation Notice of February 23rd alleging a violation of Permit-to-Install (PTI) No. 19-05.

You have requested that actions be initiated to correct the alleged violations and have also requested a written response by March 16, 2017. 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.

As you may be aware, WMF&A is preparing to relocate as the current owner of the building where we are located will not be renewing our lease. We are also growing and had anticipated that we would outgrow our current permit and believed that would not occur until after we relocated.

In your violation notice the alleged violations and our responses are as follows:

EU-Flockline2 & 3 – Special Condition 2.1a and 3.1a of PTI No. 19-05 – More than 2,000 pounds of VOC emitted from Flocklines 1-4 in a calendar month.

I believe the violation comments should refer to Flocklines 1-3 and not Flocklines 1-4. As I had mentioned, WMF&A has experienced growth recently and anticipated being able to operate within the current emission limits in our permit. Unfortunately, production at the Lovejoy location is scheduled to continue until the end of May. In the interim, we will be rescheduling work from Line 3 to Line 1 where necessary to stay below the 2,000 lb/month limit for each line. Production

from last November was an extremely busy month and we do not anticipate another month as busy until we move to the new location.

EU-Flockline 2 & 3 – Special Condition 2.1b and 3.1b of PTI No. 19-05 – More than 10 tons per year of VOC emitted from Flocklines 2 in a calendar month.

I believe the violation comments should refer to Flockline 2, only and not Flockline 3. As I had mentioned above, WMF&A has experienced growth recently and anticipated being able to operate within the current emission limits in our permit. We will be rescheduling work from Line 3 to Line 1 where necessary to stay below the 10 tons/yr limit for each line.

EU-Flockline 1, 2, 3, & 4 – Special Condition 1.6, 2.6, 3.6, and 4.6 of PTI No. 19-05 – No Method 24 testing was completed on any adhesive, coating, or cleaning solvent.

and

FG Flockline – Special Condition 5.3 of PTI No. 19-05 – No Method 24 testing was completed on any adhesive, coating, or cleaning solvent.

We apologize for any confusion on this issue as the permit was issued in 2005 and WMF&A believed we had approval to use manufacturer's formulation data in lieu of Method 24 testing. Because of the number of adhesives we use, with some being extremely low usage, we propose to perform a Method 24 test on adhesive 10F1307-R. This is because this one adhesive accounts for over 75% of total adhesive usage and over 85% of emissions. We would propose to test other adhesives as needed to ensure that over 50% of the total volume of coatings used has been tested. Please let us know if this is acceptable.

Commencement of Construction – R 336.1201 (Rule 201) – Facility commenced construction of a new facility without first obtaining a PTI.

We interpret Rule 201 to apply to process equipment and not preliminary site activities such as grading soil. However, we recognize the need to prepare and submit an application for a permit to install as we anticipate installing process equipment as early as June. We will be preparing this application on a priority basis but no later than March 31st. We will also request a waiver of approval to begin installation at that time. We are aware that proceeding with the construction at our own risk and operation of the equipment will not be authorized until the application for a permit to install has been approved.

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

Sincerely,

Melvin Fox
President