



VIA HAND DELIVERY AND E-MAIL

September 19, 2018

Mr. David Morgan
MDEQ – Air Quality Division
Grand Rapids District Office
350 Ottawa Avenue, NW Unit 10
Grand Rapids, MI 49503

RE: *Uniband USA's response to Violation Notice SRN: B3718, Kent County, dated August 29, 2018*

Dear Mr. Morgan:

Uniband USA is in receipt of your Violation Notice SRN: B3718, Kent County of August 29th alleging a violation of Rule 201 for the installation of a conveyor belt manufacturing line that no longer meets the criteria for exemption under Rule 290.

You have requested that actions be initiated to correct the alleged violations and have also requested a written response by September 19, 2018. 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, the dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

We are determined to take prompt action in resolving the cited violation and we have hired Mr. Andrew Boddy from CFR Environmental in Grand Rapids, to assist us in the process.

As you cite in your Violation Notice, Uniband USA initially installed this conveyor manufacturing line per the exemption under Rule 290. Since initial installation in 2010, volume on the conveyor manufacturing line has increased. Although the emission record keeping is not currently available, Uniband USA feels that current levels of emissions may still qualify for the Rule 290 exemption. Note that only a very small fraction of raw materials in our process would be considered a solvent as the primary raw materials in our process are PVC and a liquid plasticizer, diisononyl phthalate. Only a very small amount of material in each batch is a thinning solvent. Unfortunately, it appears that some plasticizer is becoming entrained into the exhaust stream causing opacity which we are not able to quantify, at this moment.

UNIBAND

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Therefore, Uniband USA's intention is to apply for a permit-to-install for the conveyor manufacturing process and concurrently work to eliminate the entrainment of the plasticizer. This may be accomplished through the addition of add-on controls such as an electrostatic precipitator or other similar filter. We are already selecting companies to obtain quotes and lead times on adequate filters.

If the elimination of the opacity is successful, we will be able to estimate emissions as thinning solvents, only. At this point the facility may desire to remain exempt per Rule 290. Uniband will work directly with the AQD if this is the option Uniband would like to pursue. Otherwise, the application will be prepared and submitted on a priority basis and no later than the end of October.

Thank you for your time and cooperation in this matter, please let me know if you have any questions or further requests.

Sincerely,



Silvia Garbagni,

Process Engineer

On behalf of Milco Marchetti, Owner

cc: Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD

P.O. Box 30260, Lansing, Michigan 48909-7760

cc (via email): Mr. Milco Marchetti, Uniband USA

cc (via email): Ms. Sarah Waidelich, Uniband USA

cc (via email): Mr. Andrew Boddy, CFR Environmental