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February 19, 2019



State of Michigan
Department of Environmental Quality (DEQ)
Air Quality Division (AQD) – Detroit District
Suite 2-300
3058 W. Grand Blvd.
Detroit, MI 48202
Attn: Mr. Jorge Acevedo, Senior Environmental Engineer

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State of Michigan
Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Attn: Ms. Jenine Camilleri, Enforcement Unit Supervisor
PO Box 30260
Lansing, MI 48909-7760

RE: Violation Notice dated 01/29/19
Repair Industries of Michigan DBA RIM Custom Racks
State Registration Number (SRN): M3847

Jorge:

In response to the violation notice dated January 29, 2019, the dates the violation occurred are detailed in records previously submitted to the DEQ and include work days from January 4, 2016 to date. The violation is ongoing. The cause of the violation was the reformulation of purchased coatings that RIM Custom Racks uses to finish metal racks for the automotive industry.

The paint products we purchase & use have been produced by a division of Quest Specialty Chemicals which was acquired by Valspar in June 2015. In researching the violation, I discover that for a while they continued to produce coatings to the then-current formulas. In January 2016, Valspar changed formulas although we were not informed. We continued to calculate emissions and permit compliance using the paint profiles that were previously provided and tested. These new formulations contain small amounts of xylene which come into the coating product through the base resin, which is not produced by Valspar but is a purchased component. These amounts are in the range of 1-2% xylene (by weight) of the ready-to-spray coatings we use. Valspar has since been acquired by Sherwin-Williams.

We have also initiated action with our supplier Valspar/Sherwin to work on reformulating coatings to be HAP-Free (and therefore xylene-free) and they reported to me that they are in laboratory testing to verify coating performance and compliance, although a suitable reformulation that meets customer coating performance requirements has not yet been developed by Valspar/Sherwin. We are also reviewing a potential alternate supplier that may also be able to provide HAP-Free coatings, although they have not yet been able to develop a suitable reformulation that meets customer coating performance requirements.

Therefore, to resolve the violation, we are submitting an application for permit modification by the end of the month, February 2019, to modify limits of special condition 4.2.

Respectfully,

Todd Schorer
Plant Manager