



MICHIGAN
METAL COATINGS
COMPANY

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May 23, 2019

Shamim Ahammod
DEQ, AQD, Southwest Michigan District
27700 Donald Court
Warren, MI 48092

Dear Mr. Ahammod:

This letter is to address MMC's violation notice dated May 3, 2019 for purported violations found during an inspection of our facility on February 21, 2019 to the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994 PA 451, as amended (Act 451). These violations were discovered during an inspection of our Plant # 1 location under Permit to Install (PTI) number 139-06 & 116-06B.

Regarding the first violation of our EUWASTEEVAP for Special Condition I.1, records show as of February 2019, the VOC emissions from wastewater evaporated exceeded the permit limit of 5.00 TPY having the actual 12 month rolling average of 6.65 TPY. Actions taken by MMC as of May 9, 2019 include no longer evaporating any wastewater and instead having it disposed of and treated off-site to a waste-water treatment facility. Furthermore, the EUWASTEEVAP unit is scheduled to be decommissioned on or before May 31, 2019. This will allow the VOC to be below acceptable limits of 5 TPY for a 12- month rolling average by June 1, 2019.

The second violation pertaining to FGCOATERS Special Condition I.2, records do show for EUCOATER5 from February 2019 that the daily volume-weighted average of VOC content of the coatings as applied on a daily basis exceeded the permit limit of 3.5 lbs/gal (minus water) on the days indicated in the violation notice. However, this is because the Excel spreadsheet was inadvertently altered that shifted the "Cell Reference" causing the formula to calculate the VOC's from the wrong cells. Corrections to the Excel Spreadsheet have been made and now show the proper values which reflect MMC's compliance to the permit (See Attached Amended Spreadsheet).

The third and final violation found during the inspection under Special Condition IV.3 (PTI No. 139-06 for EUBURNOFF oven where finding show the primary burner temperature was 496°F while the afterburner temperature was below 1400°F (1289°F). According to your report, the violation is the result of a faulty interlock system that allows the primary burner to start before the secondary burner reaches the minimum temperature of 1400°F. The primary burner also started even though the afterburner was below the required 1400°F.

On May 7, 2019 MMC contacted Craig Schultz of Joseph M. Day Company to evaluate the overall oven operation and interlock system. Mr. Schultz's findings and summary are as follows:

Observations of chart recorder history indicates oven is able to establish minimum required emissions temperature of 1400°F but unable to maintain temps once product is inserted into main oven, decreasing stack temperature to 1200°F on average.

To resolve temperature stabilization fuel rate and air inlet ratios were increased to from a manifold pressure of 4.26 inches of water column at main burner and afterburner to a manifold pressure of 7.8 inches of water column. The increase of manifold pressure thus increased fuel Btu input by approximately 150mbh. Adjustment to air damper was also necessary to increase total inlet rate and maintain proper air/fuel ratio. The results are seen in the combustion report attached where a stack temp of +1600°F was established and an overall temperature of 1400°F was maintained throughout a total oven run sequence.

Work is currently scheduled to be performed 24 May 2019 to install a red lion reverse acting temperature controller with passkey enabled security and will be set above the 1400°F minimal stack temp requirement, thus keeping the afterburner temperature in compliance throughout the entire process and not have the capability of being adjusted by anyone without the passkey. Currently the stack temp is maintained by a dial type controller with employee or operator access and is set to 1425°F.

Also, with the temperature controller, installation of a new thermocouple shall proceed to ensure the highest accuracy reading of stack temp possible. Thermocouple will have a rating of no more than 2500°F and be installed in the current thermocouple location.

I have also attached a copy of Mr. Schultz's report for your review. If you need additional information or have any questions please contact me at 810-966-9240.

Sincerely,



Richard Rumohr
Quality Assurance Manager

cc: Ms. Jenine Camileri – Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, MI 48909-7760