



Wright Coating Technologies
1603 North Pitcher Street
Kalamazoo, MI. 49007

September 15, 2021

EGLE – AQD
Kalamazoo District
7953 Adobe Road
Kalamazoo, Michigan 49009

Re: Wright Coating (SRN N0991) - Response to Violation Notice dated August 25, 2021

Dear Sir/Madam:

Wright Coating Technologies (“Wright Coating”) is submitting this correspondence in response to the Violation Notice (“VN”) we received recently, dated August 25, 2021. The VN alleged that Wright Coating was in violation of 40 CFR 63 Subpart EEE as well as State of Michigan Rules 336.1210 and 336.1211 requiring a Title V Renewable Operating Permit. The VN was issued based upon information supplied by Wright Coating to the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Materials Management Division (MMD) indicating that spent paint filters incinerated in the facility’s burn-off oven were determined to meet the definition of a hazardous waste.

The VN further requests Wright Coating initiate necessary actions to correct the violation and provide additional information regarding dates, causes and the current status of the alleged violation. The VN does not allege there has been any exceedance of the emissions limits of the existing Permit to Install (PTI # 212-16) or any negative air quality impact from Wright Coating’s operations.

The VN also states that if observations or statements in the VN are inaccurate or do not constitute violations of the applicable legal requirements cited, Wright Coating should provide factual information to support our position. As noted in the VN and stated above, Wright Coating informed EGLE that the spent paint filters initially questioned were determined to be a hazardous waste, due to the characteristic of “ignitability”. However, upon further review of our actions in responding to EGLE’s request to test the filters, Wright Coating is not certain that the previously submitted information was accurate.

The process previously followed at Wright Coating was to remove and replace spent filters from the paint booth during third shift operations (coating operations are only conducted during first and/or second shift). The paint filters were then stacked on trays and during the following day loaded in the burn off ovens.

However, in an effort to respond expeditiously to the VN issued by EGLE-MMD on June 29, 2021, a paint filter was removed from the booth during a small break in first shift coating operations. The filter was bagged and sent to an appropriate laboratory for analysis. This sampling method did not represent the actual process followed, and therefore, Wright Coating does not believe it is appropriate to rely on the previous analytical data which supported the conclusion that the spent paint filters were considered hazardous (i.e., ignitable). Accordingly, we have since sent a second paint filter for laboratory testing. This second sample submitted for testing is representative of the actual conditions under which the filters were previously processed.

Based on this information, Wright Coating believes additional time is necessary to determine the validity of the referenced VN. Further, Wright Coating cannot respond to certain requests within the VN, such as the dates the violation occurred or an explanation of the causes/duration, until it can be confirmed that under the previous process, the paint filters were in fact "hazardous waste". To that effect, Wright Coating will be conducting appropriate and representative testing of additional filters to further evaluate the ignitability characteristic of the filters.

In response to EGLE's VN for responses indicating if the violations are ongoing, a summary of the actions taken to correct the violation and the dates which these actions took place, Wright Coating states with certainty that incineration of paint filters which led to the alleged violation are not ongoing and ceased immediately upon discussion with EGLE Inspectors on May 25, 2021.

Wright Coating is submitting this correspondence to meet the timing requirements of the August 25 VN which required a response by September 15, 2021. However, Wright Coating believes that additional time is warranted to allow the gathering of additional, accurate facts in responding to all allegations within the VN. Should the filters be determined not to be hazardous waste, the main components of the VN will be addressed and considered not applicable.

It is Wright Coating's intent to meet its environmental requirements and maintain positive relations with all environmental agencies. Wright Coating strives to demonstrate excellent environmental stewardship and takes the allegations within the VN very seriously. Please advise if our request to respond fully once additional data is obtained is acceptable. Wright Coating anticipates being able to provide a final response by September 30, 2021.

Please contact me at (269) 344-8195 if you have any questions on this correspondence.

Sincerely,

Jim Grimes
Maintenance Supervisor

c: Ms. Jenine Camilleri, EGLE AQD
G. Schertzing, Esq., Miller Johnson