



# PRS Manufacturing Co.

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RECEIVED

MAY 14 2018

AIR QUALITY DIVISION  
GRAND RAPIDS DISTRICT

Mr. Adam Shaffer  
Environmental Quality Analyst  
Air Quality Division  
Department of Environmental Quality  
350 Ottawa N.W. Unit 10  
Grand Rapids, MI 49503

May 12, 2018

Subject: Response to Violation Notice dated April 23, 2018

Dear Mr. Shaffer,

This follows up the Violation Notice received following your inspection of PRS Manufacturing Company on March 2, 2018 and your follow up visit on March 29, 2018.

As per the above violation notice, you determined after a review of the strip oven chart recorder data, the following issues were observed in violation of Permit #915-85A:

1. Instances were detected where the temperature would dip below the 1400° Fahrenheit limit during the strip oven operations. These incidents appeared to be intermittent and brief and we believe correlate to the manual adjustments made to control gas flow to the strip oven in order to achieve proper operation.
2. During start-up of the primary chamber of the strip oven, there were some times where the afterburner had not reached the 1400° Fahrenheit temperature required in the permit before the primary burner was started. Again, with the oven being manually controlled, this scenario may have occurred occasionally.

Since your inspection, we believe we have resolved this issue with an upgrade to the strip oven controls. We have installed an automatic control system on the strip oven which was completed on May 8, 2018. The controls are set up to start the afterburner first and not allow the primary burner to fire until the afterburner reaches 1400°. This is tracked on the chart recorder. We also have the controls currently set to run the afterburner at an average of 1600° so that fluctuations in the burner temperature that occur as conditions inside the oven change will not drop below the 1400° temperature limit. Since these automatic controls have just been installed, we will continue to monitor both the oven and controls to make sure the oven is operating properly and make adjustments when needed. Our intent is to continuously operate the strip oven in compliance with our permit but also optimize the afterburner so that we are not burning excess natural gas.

We have also reviewed the oven operating requirements with our staff and have reached out to outside parties to help us with our permit recordkeeping and other aspects of environmental compliance. We will now be working with an environmental consultant to

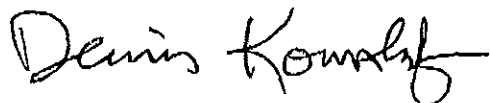
upgrade our recordkeeping and assist us with internal monitoring of our compliance status.

One additional item that we want to clarify is the point that was made in your staff report that the permit limit of 150 batches in PTI #915-85A; Special Condition FGOVENS, II. Material Limits, SC No. 1 applies only to the batches of racks being put through the strip oven. This material limit was set to limit the amount of hydrogen chloride (HCl) that was emitted from the strip oven during the removal of the Plastisol coating from the racks. We are not adding the number of batches of these same racks put through the bake oven in our recordkeeping, since minimal HCl emissions are expected as the Plastisol coating is cured on the racks and we believe this would be placing unnecessarily restrictive limits on our production. You indicate in your March 2, 2018 staff report that after further review, you agreed with this position on the counting of the number of batches. The bake oven has never been used as a strip oven. If the permit is modified in the future we will request that the two ovens be maintained as separate Emission Units and not considered to be a Flexible Group, since most of the potential to generate emissions and permit requirements to address the emissions appear to apply to the operation of the strip oven.

For your information, we will also be working with our environmental consultant to apply for a General Permit for our primer and dip tank operations and help set up a recordkeeping system to demonstrate compliance with the permit. We believe the General Permit will be a better option for our company's coating operations going forward versus the permit exemption we are currently operating under.

Please do not hesitate to contact me directly if you have any questions. I can be reached at 616-784-4409 or at [prsmfg@gmail.com](mailto:prsmfg@gmail.com). You can also contact Jill Koebbe of Air and Water Compliance Group, LLC at 231-557-0464 or at [jillann\\_koebbe@awcglc.com](mailto:jillann_koebbe@awcglc.com) if you have questions on the information presented above.

Respectfully submitted,



Dennis Kowalczyk