

March 12, 2019

Ms. April Lazzaro
Senior Environmental Quality Analyst
Michigan Department of Environmental Quality
Air Quality Division, Grand Rapids District
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503

Ms. Jenine Camilleri
Enforcement Unit Supervisor
Michigan Department of Environmental Quality
Air Quality Division
P.O. Box 30260
Lansing, MI 48909-7760

Re: Southern Lithoplate, Inc.
Violation Notice – SRN N1872, Kent County

Dear Ms. Lazzaro:

This letter is in response to the MDEQ-AQD Violation Notice issued February 20, 2019 regarding the site inspection conducted on January 9, 2019. Southern Lithoplate Inc. would like to review the items identified and corrective actions that have occurred or are scheduled to occur.

On January 9, 2019 the AQD inspection resulted in the respective violation notice which indicated three items of noncompliance.

Item 1 – Acid gas scrubber No.3 – inspector observed ductwork leaking. Southern Lithoplate immediately investigated and found a crack in the PVC duct. A contractor was immediately scheduled, and repairs were made and communicated to the MDEQ on January 10, 2019.

As requested we have revised our operations and maintenance plan and have increased inspection frequency and content. Copies of the revised maintenance plans were electronically submitted to the Grand Rapids district office on March 1, 2019. Southern Lithoplate has added a visual inspection of the ductwork to avoid this issue in the future. The duration of the leak is unknown as inspecting the ductwork was not part of our original inspection procedures.

The inlet ductwork leaking would not impact the Air Emissions from FG-TANKS as the liquid flow through the scrubber system packing bed was maintained. Therefore, we believe the scrubber was operating in a satisfactory manner as it continued to control the exhaust gases. The uncontrolled emissions from FG-TANKS will meet the 6.0 tpy acids emission limits for the current operation.

Item 2 – Regenerative Thermal Oxidizer – The oxidizer has been routinely maintained by both contractors and internally since 2006 when the unit was installed. We have been very diligent in maintenance and responding to repairs as needed on the unit. The oxidizer has been repaired and operating properly since January 2, 2019, Following is a detailed discussion of the repairs and maintenance of the oxidizer.

We did have an event that occurred affecting production starting on December 17, 2018 – January 2, 2019 when the unit was repaired. In this period of time the production Line ran without abatement from December 17th at 5pm and ran until December 23rd at 4:30am (total of 5.5 days). The production Line was down for 3 days in observance of the Christmas Holiday. Line started back up on December 26th at 7:30am and shut down December 30th at 6:00am (approximately 4 days). The Line was again shutdown for 3 days in observation of the New Year Holiday. The Line resumed production on January 2, 2019 and the oxidizer

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was repaired and functioning properly. In summary Southern Lithoplate ran without abatement for approximately 9.5 days in total.

Southern Lithoplate worked diligently to make the repair to the oxidizer between the dates listed above. We reviewed the manual for diagnosing the faults. After reviewing all the documentation and equipment with no luck we contacted Ceco-Adwest on 12/17/18 and were in daily communication with the manufacturer throughout the course of the time period. We also were in contact the B&B Engineering and Hurst Mechanical. Hurst Mechanical was on site on 12/18/18. They also went through the equipment. Hurst and Adwest were in agreement the modulating gas valve had failed. Adwest informed us that the modulating gas valve was obsolete, so they needed to re-engineer the whole gas train. We had the engineering completed, purchased the required parts, and the installation of both the mechanical and electrical components for the gas train completed on 12/28/18. Work was completed working closely with Ceco Adwest engineering, internal labor and FHC Mechanical. The repair resulted in no change to the oxidizer fault condition or performance. On 12/28/18 Southern Lithoplate Inc. contacted FHC and Adwest for onsite service. I scheduled FHC to open the beds and inspect internally on 12/31/18. I also scheduled Adwest for a site visit on 1/2/19. On 12/31/18 FHC discovered the hot gas bypass dampener had broken away from the actuator. On 1/2/19 Adwest repaired the dampener and went through the equipment and made a list of recommended repairs. The oxidizer has been running well ever since 1/2/19.

The dampener that failed was a catastrophic failure that was not documented well in trouble shooting or inspection requirements. As indicated even Adwest the OEM felt it was the gas valve. We continued to work as quickly as possible and through as many resources as we could to correct to situation.

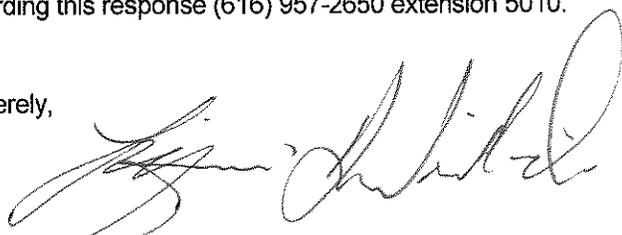
Additionally, during Adwests visit they found the media was approximately 10" below the bed shelf and recommended adding media. Adwest also identified the hot gas bypass seal for the dampener needed to be replaced and the actuator motor was not functioning. Adwest also recommended the thermocouples be replaced. Maintenance items have been scheduled for repair on Monday 3/18/19. Southern Lithoplate will have Adwest and FHC Mechanical onsite to complete all repairs recommended by Adwest. As requested, we have revised our operations and maintenance plan and have increased inspection frequency and content. Copies of the revised maintenance plans were electronically submitted to the Grand Rapids district office on March 1, 2019.

Item 3 – Continued to operate Line 3 without control device. There was some confusion regarding this requirement. The Malfunction Abatement Plan that was submitted and approved at the time of the permit renewal stated Southern Lithoplate could run without control in the case of a major malfunction which was in direct conflict with the permit requirements as pointed out by the inspector. The revised operation and maintenance plan submitted on March 1, 2019 requires shutdown if the control device has a malfunction.

FG-COATERS&OVENS is allowed to bypass the RTO when running waterborne coatings with a VOC content of less than 0.5% by weight. Southern Lithoplate has a 66 tpy VOC emission limit based on a 12-month rolling time period. The 2017 and 2018 actual VOC emissions were 8.372 tpy and 10.818 tpy respectively. Southern Lithoplate continues to operate well below their allowed 66 tpy VOC emission limit even with including the uncontrolled emissions during the recent RTO malfunction.

Southern Lithoplate has been working diligently to resolve these issues. We have corrected the violations and are confident our updated procedures will prevent a reoccurrence. Please contact me regarding any questions or concerns you may have regarding this response (616) 957-2650 extension 5010.

Sincerely,



Liquori Kirkbride
EHS Engineer