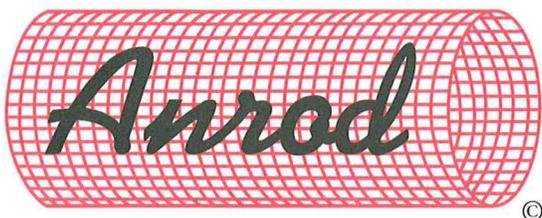


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SCREEN CYLINDER CO.

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CASS CITY, MICHIGAN 48726-0117
U.S.A.

State of Michigan
Department of Environmental Quality
Saginaw Bay District Office
401 Ketchum St. Suite B
Bay City, MI 48708

Attn: Matthew Karl
Phone: 989-439-3779

February 12, 2018

Re: Your letter of January 31, 2018 – Violation Notice

Dear Mr. Karl,

We are in receipt of your letter of January 31, 2018 to Charmain Bauerschmidt. At the end of your letter you offered to answer questions regarding the violations and the actions necessary to bring our facility into compliance, and we would appreciate your input.

Since receipt of your letter we have been: 1) trying to understand the rules and stated violations, and 2) gathering facts in preparation for further discussion of the actions necessary with you. The following is a summary of what has happened at our facility which we believe to be the topic of your violation notice, and the results of our fact gathering.

In November of 2015 we purchased and installed a new Branson Model B950R Ultrasonic Vapor Degreaser (a batch cleaning machine). By way of your violation notice, we now understand that we needed a permit to install this equipment. One of our questions is if it is appropriate to submit a permit to install (PTI) application for this equipment as part of our abatement, and if so, we request your assistance to complete the application.

Our machine has a vapor/air interface of 4.4 square feet. Upon review of 40 CFR 63.463, we believe that we comply with paragraph (a), with the exception of subparagraph (3) as our machine does not have an automated parts handling system. We have contacted the equipment manufacturer to see if they can retrofit our machine with an automated lift mechanism, and if so, what the costs and lead time would be. The manufacturer is in receipt of our request, but we do not have their response yet. We believe that 40 CFR 63.463 paragraph (b)(1) applies to our situation, and we believe that we are in compliance with (i) option 6, as our machine has a freeboard refrigeration device and a freeboard ratio of 100%.

Screens by Anrod

February 12, 2018

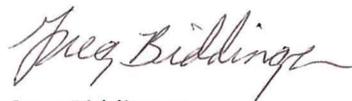
p.2

We have reviewed 40 CFR 63.464 (alternative to meeting the requirements in 63.463). We believe that the appropriate sections are 63.464 (a)(1)(i) and (ii). Based on Table 5 the appropriate emissions limit for a batch vapor solvent cleaning machine is a 3-month rolling average of 150 kilograms/square meter/month. Assuming a density for trichloroethylene of 12.11 pounds per gallon, and a vapor/air interface of 4.4 square feet, we calculate our emissions limit to be 11.16 gallons/month, or 133.95 gallons/year. We return our used solvent to our solvent supplier for recycling/reclamation. While we have not been using the test method specified in 40 CFR 63.465, we have been keeping a log of our solvent gallons purchased and gallons recycled (our solvent additions and deletions). Since 2006 we have purchased 1400 gallons and recycled 1440 gallons (see attachment). We can verify this claim with our purchase order and manifest records.

Anrod is committed to working with the DEQ to abate these violations. While we were not aware that we were required to submit a PTI and receive approval prior to installing a new vapor degreaser, we understand now that it was our obligation to do so. And while our equipment does not have an automated lift mechanism and our solvent usage has not been documented according to 40 CFR 63.465, we believe that our records show that both prior to and since installation of the new vapor degreasing machine in 2015, we have not and are not exceeding the appropriate emissions limit. Therefore, we request that we be allowed to continue to use our equipment while these violations are being abated (so that we don't interrupt delivery to our customers), and that no fines be assessed. We hereby request your guidance as to the options and actions necessary to bring our facility into compliance.

Sincerely,

Anrod Screen Cylinder Co.



Greg Biddinger
President

Attachment

cc: Charmain Bauerschmidt

TRICHLOROETHYLENE USAGE

<u>YEAR</u>	<u>GALLONS PURCHASED</u>	<u>GALLONS RECYCLED</u>	<u>NET GALLONS USED</u>	<u>CUMULATIVE GALLONS USED</u>	<u>MANIFEST NUMBERS</u>
2006	150	205	-55	-55	148941, 10361609
2007	150	110	40	-15	2577866
2008	0	0	0	-15	
2009	200	265	-65	-80	5810760, 5381529
2010	100	100	0	-80	7453254
2011	200	200	0	-80	8043745, 5810818
2012	100	100	0	-80	9514186
2013	150	110	40	-40	1641442
2014	150	100	50	10	11919349
2015	0	100	-100	-90	11919153
2016	100	150	-50	-140	11918053, 11919073
2017	100	0	100	-40	
2018	<u>0</u>	<u>0</u>	0	-40	
Total:	1400	1440			