

DEQ-AQD LANSING D.O.

AUG 15 2016

August 15, 2016

Michelle Luplow,  
Environmental Quality Analyst  
Air Quality Division,  
Michigan Department of Environmental Quality  
P. O. Box 30260  
Lansing, MI 48909 -7760

Re: Violation Notice dated July 26, 2016 for SRN: P0429, Eaton County

Ms. Luplow,

DexSys was made aware of the deviation of the Special Conditions of PTI No. 38-13D collecting pressure differential data every 15 minutes at the paint system openings. This deviation was brought to our attention by your department in April of 2016. The deviation in record keeping began at the process start up. It was caused by a lack of understanding of the record keeping requirement. DexSys began immediately to implement corrective actions and on May 3rd 2016 at 12 AM rather than collecting pressure differential data at both inlets to the permanent total enclosure (PTE) once every shift, DexSys started collecting data by capturing screen shots of the monitor read-out and has been in continuous compliance since that time. This information was reported in the Semi-Annual Compliance Report submitted to your department at the end of July 2016.

DexSys is confident it met all emission limits, even though there are no records of pressure differential during the initial compliance period through April 2016, though MDEQ Air Quality has assumed that the add-on control device was achieving zero control efficiency during that period. DexSys did have in place during the same time period an alarm system the Fischer device that monitors air flow to the RTO. This is a different monitoring system than the one described in the previous paragraph. This normally operates at a range of 5.8 Inches Water Column (iwc). Our current alarm warning threshold is at 3 iwc and a fault occurs at 1 iwc. This alarm shuts down the entire paint application for the paint system. If at any time the pressure differential or flow rate falls out of tolerance the paint operation will shut down and cannot be restarted until the pressures and flow rate have been restored. Because none of these events took place during the stated time period, the PTE was operating as designed. DexSys believes it was not out of compliance with the HAP emission limit even though we were not recording the pressure differential data at the PTE openings every 15 Minutes as required.

DexSys uses two Fischer Digital Differential Pressure Analysis Unit/Transmitters. One is placed at the entrance of the Ad-Pro booth and the other at Cooling Tunnel 3 to monitor pressure drop across the system. The manufacturer recommends regular inspections to guarantee reliable operation and a long life cycle, such as:

- Checking the function in combination with downstream components.
- Checking the leak-tightness of the pressure connection lines.
- Checking the electrical components.

These inspections have been added to the monthly Preventive Maintenance Schedule along with those inspections required under 40 CFR 63.4568(g)(2)

Validation checks will include monthly Accuracy Audits of the two Fischer Digital Differential Pressure Units using a Manometer that will be purchased by DexSys to verify the accuracy of the units.

Leak checks of the two Fischer Digital Differential Pressure Units will be completed by the use of a hand held pump and gage that will be connected to the two pressure connection lines and held at no pressure for 15 seconds. Visual inspections of the equipment will be completed during these checks.

In summary:

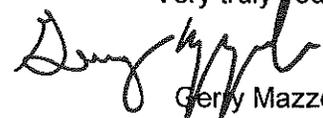
Corrected

- The record keeping provision of 40 CFR 63.4530(i)(3) and Table 1. Item 6c is in place and now part of the standard operating procedure to prevent recurrence of the violation.
- The record keeping provision cited above also addresses the perceived violation of zero control efficiency and HAP limit exceedances under §§63.4563(c)(2) and 63.4490(a)(1).

Ongoing

- The differential pressure monitor maintenance is partially in place and will be fully implemented by September 9<sup>th</sup> 2016. Once the Manometer and hand-held pump / gage are purchased and calibrated if required. To prevent recurrence, date listed in the previous sentence will include entering the validation checks, accuracy audits, leak checks and visual inspections into a computerized preventive maintenance tracking system that automatically alerts personnel to the need to complete these items at the required frequency.
- The initial compliance report will be modified and resubmitted by August 30<sup>th</sup> 2016.

Very truly yours,

  
Gerry Mazzola  
DexSys General Manager