



Date: August 10, 2016

To: Kaitlyn DeVries – Environmental Quality Analyst – Air Quality Division of Michigan Dept. of Environmental Quality

From: Andy Ribbens – President – Premier Finishing, Inc.

RE: Violation Notice Dated July 27, 2016 Reply - Premier Finishing, Inc. Black Oxide Line

I am writing the letter in reply to the violation noticed I received regarding installing and operating an unpermitted process at the 3180 Fruit Ridge Ave, NW Walker, MI facility, namely a black oxide finishing line. This was noted during a compliance inspection of Permit to Install number 77-15.

We installed our black oxide line in the 3180 Fruit Ridge Ave., NW building in 1999. Never having run a black oxide finishing line before, I hired the owner of a current black oxide business in Holland who wanted to get out of business to help us get started in this new venture for our company. They never did have an air permit for their line so I never applied for one myself. We have been running the line from 1999 to the current day.

When I decided to open an anodizing line, I hired an industry consultant. One of the things we learned from him is that we will probably need to get an air permit for our new anodizing line. I took the training class offered in Lansing and applied for the permit when we installed the anodizing line.

Below is a list of tanks in our current black oxide line and their contents:

Alkaline Cleaner – Unikleen 14B (Sodium Hydroxide) – **Vented to the outside**
Double counter flow rinse
Pickle – 50% Muriatic Acid solution – **Vented to the outside**
Rinse
Black Oxide – Pentrate Ultra (Sodium Hydroxide) – **Vented to the outside**
Double counter flow rinse
Oakite 33 Phosphoric acid solution – **Was vented to the outside but is not any longer**
1831 Citric acid solution – **Was vented to the outside but is not any longer**
Durawax rust inhibitor solution
Lab Oil 100 rust inhibitor solution
Laq-Dip NC rust inhibitor solution
BoiCorr SC rust inhibitor solution
Rust Veto 2186 rust inhibitor solution

Based on the Michigan Air Pollution Rules listed below, it is my understanding that the only tanks that I would have to be concerned of for an air permit would be the three tanks (Emission Unit) being vented directly outside of the building. I am basing this on *R336.1285 Permit to install exemption; miscellaneous*

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Rule 285. The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following: (r) Equipment used for any of the following metal treatment processes if the prior emissions are only released into general in-plant environment:

- (i) Surface treatment
- (ii) Pickling.
- (iii) Acid dipping
- (iv) Cleaning
- (v) Etching

As I cannot go back and change the fact that I did not apply for the permit when the line was installed, it is upon me to either verify that in fact the line does not require an air permit or what steps I will need to take to get into compliance with the requirements. Although I will try to work through this myself, I may need to seek outside consult.

If possible, I ask the following:

- To continue to run the line as we have until this can be resolved, and
- 60 days so I can determine what steps I need to get into compliance and to submit the Rule 290 paperwork to do so. I may ask for more time depending on what I find but I will try to have this completed by the 60 days.

I think this answers all of the questions listed in the violation notice but please let me know if there is anything further you would need from me in the interim. Thank you for your consideration in this matter.

Andy Ribbens

Premier Finishing