



July 30, 2024

April Lazzaro
Senior Environmental Quality Analyst
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
350 Ottawa Avenue NW, Unit 10
Grand Rapids, Michigan 49503

Subject: Response to Violation Notice Dated July 10, 2024

Reference: Siliconature Corporation SRN: P0742
4255 68th Street SE, Caledonia, MI 49316

Dear Ms. Lazzaro:

This letter is submitted in response to the subject Violation Notice (VN) that was issued to Siliconature Corporation (Siliconature) on July 10, 2024. A summary of the violations that were identified and our response to each is included below.

1. Waste Materials Stored in Containers That Were Not Closed

Waste materials were observed to be stored in containers that were not fully closed. Air Permit No. 158-16B requires that waste coatings and cleanup solvents be stored in closed containers prior to transfer to a licensed waste management facility. These containers were not closed in order to avoid pressure buildup from the reaction of the unreacted catalysts. Siliconature will develop an acceptable safe method of properly storing these wastes and will develop a method for determining representative VOC emissions from the storage of these wastes in containers that were not completely closed. These items will be completed and provided to you no later than August 9, 2024.

2. Malfunction Abatement Plan (MAP) for the RTO Needs to be Updated

TANN replaced the ceramic media in the RTO this past February. The need for replacement of the RTO media is based on the annual inspection observations and recommendations by TANN, in conjunction with the fan speed history of the capture exhaust system. The fan speed normally increases over time to maintain proper system pressures such that the organic vapors evolved in the coating operation continue to be fully captured. TANN relies on these observations and trends and advises accordingly.



It was identified in the Violation Notice that the MAP should be updated to reflect the monitoring and indicators for assessment of media fouling, and the associated need for replacement of the media. We revised the plan to incorporate this. The updated revised MAP dated July 2024 is attached and is included as part of this response.

3. Gravure Cylinder Acid Cleaning Process

Siliconature concludes that the gravure cylinder acid cleaning process is not required to have a Rule 201 permit. EGLE requested that a Rule 278a permitting and exemption evaluation be completed for this process. This evaluation is attached and included as part of this response.

If you should have any questions, please call me at (616) 619-9089 x-115, or Mark Horne of Environmental Partners at (616) 928-9128.

Sincerely,
SILICONATURE CORPORATION

A handwritten signature in black ink, appearing to read "Kevin Biehl". The signature is fluid and cursive, with the first name "Kevin" and last name "Biehl" clearly distinguishable.

Kevin Biehl
Operations Manager

Enclosures

cc: Annette Switzer, EGLE AQD
Christopher Ethridge, EGLE AQD
Brad Myott, EGLE AQD
Jenine Camilleri, EGLE AQD
Heidi Hollenbach, EGLE AQD
David Arado, President, Siliconature Corporation
Mark A. Horne, P.E., Environmental Partners, Inc.