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On July 19th 2017, the Department of Environmental Quality, Air Quality Division, conducted an inspection of Lloyd/Flanders Industries. This letter is the written response to the Violation Notice.

Item #1. Rule/Permit Condition Violated: SC. 13 VOC content of the coatings used in the prepaint/topcoat operation shall not exceed 3.0 lbs per gallon.

Lloyd/Flanders response: All coatings used in the 4 electrostatic spray booths contain less than 3.0 lbs/gal of VOC. No other coatings are used in our Topcoat process. There was a large amount of data that was requested, I regret that some of the information provided was unclear as to a where used description.

Item #2. SC 22. The permittee shall keep a separate record for each calendar month for the following for the Topcoat operation, Touchup operation. and the Miscellaneous volatile organic compounds usage:A2. The amount in gallons of each coating and miscellaneous volatile organic compound used.

Lloyd/Flanders response: In all past MDEQ Inspections we have been asked to provided usage of paints and solvents for a requested quantity of time that was specified by the Inspecting Officer. This requested information was then complied and forwarded to MDEQ. Lloyd/Flanders will start measuring and recording for each month all coatings and miscellaneous VOCs used in the Topcoat operation, Touchup operation, and miscellaneous volatile organic compounds used.

Item #3. SC 22. The permittee shall keep a separate record for each calendar month of the following for the Topcoat operation, Touchup operation, and Misc. VOC usage. B. Calculation of the following: 12 month rolling average VOC emission rate in tons per year for each process.

Lloyd/Flanders response: In all past MDEQ Inspections we have been asked to provide data for a requested quantity of time by the Inspecting Officer. This requested information for that time period was then forwarded to the MDEQ. Lloyd/Flanders will use and maintain a spread sheet to show Monthly and 12 month rolling time period emission rates for the Topcoat operation, Touchup operation, and Miscellaneous VOC. usage emissions.

Item #4. SC. 22. The permittee shall keep a separate record for each calendar month of the following for the Topcoat operation, Touchup operation, and Miscellaneous VOC usage. C. Calculation of the following: 12month rolling average HAP emission rates in tons per year for each individual HAP and for all HAPs combined.

Lloyd/Flanders response: In all past MDEQ inspections we have been asked to provide data for a requested quantity of time by the Inspecting Officer. The requested information for that time period was then forwarded to the MDEQ. Lloyd/Flanders will use and maintain a spread sheet to show Monthly, and 12 month rolling time period HAP emission rates in tons per year for each individual HAP and for all HAPS combined.

Lloyd/Flanders will start the measurement of solvent input and solvent to be shipped off site during the week of August 28th 2017. All paint usage for each calendar month will also be recorded in to a monthly use spread sheet. MDEQ has given Lloyd/Flanders until September 30th 2017 to comply with the conditions identified in the Violation Notice.

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*8/30/17*