



July 23, 2019

Mr. Sebastian G. Kallumkal
EGLE, AQD, Warren District
27700 Donald Court
Warren, MI 48092-2793

Re: NOV Letter dated July 3, 2019

Dear Mr. Kallumkal:

IPG notified the Department June 20, 2019 of an apparent violation of the requirements for implementation of National Emission Standards for Hazardous Air pollutants for Miscellaneous Coating Manufacturing, 40 CFR 63, Subpart HHHHH. Subsequent to the notification, IPG received a NOV letter dated July 3, 2019 which requested additional information. The purpose of this letter is to provide the requested information and status of our ongoing investigation to determine applicability of the MCM MACT and status of our corrective action.

The following information was requested by the Department:

Dates of violation

IPG began manufacturing HAP containing coatings that were sent offsite to nonaffiliated operations in 2016. The process equipment used to make these coatings are used primarily to produce coatings used onsite in coating operations subject to the POWC MACT, Subpart JJJJ.

Causes and duration of the violation

The cause of the violation was an unintentional oversight of Subpart HHHHH applicability in the decision process to produce coatings designated to be sent offsite to nonaffiliated operations. Greater than 95% of all coatings produced at the facility are used onsite in processes subject to the POWC MACT. The duration of the violation has been intermittent. Less than 5% of the volume of coatings produced at the facility have been sent off site.

Summary of actions that have been taken to correct the violation and dates by which these actions will take place

Immediately upon discovering the apparent violation, IPG contracted with TRC, an environmental engineering company to investigate the following:

- Confirm applicability of MCM MACT to process equipment
- Review possible compliance and/or control options
- Recommend best option to implement identified requirements.

TRC completed an onsite investigation the week of 06/17/2018 and is in process of finalizing the report for MCM applicability and recommended corrective action.



Parallel to this effort, IPG investigated options to initiate a research program to investigate feasibility of replacing the HAP containing coatings sent offsite with non HAP containing coatings. Preliminary results indicate that this would be a 1-2 year research and development process which may not be successful considering the required performance characteristics of the products.

Steps being taken to prevent a reoccurrence

IPG will be diligent in assessing regulatory impact for new or modified process equipment or product changes that may potentially require coatings produced in POWC MACT regulated equipment to be sent offsite for subsequent use. If regulatory impacts are identified through this management of change process, IPG will review the proposed changes with the Department to confirm requirements prior to implementing.

IPG would like to schedule a meeting with the Department to discuss the best path forward to address and correct these issues. The timing for this meeting will be subsequent to TRC finalizing the MCM investigation report. We will keep the Department informed on our progress and appreciate your assistance to resolve these matters.

Please advise if additional information is needed.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Melissa Oakley", with a long horizontal flourish extending to the right.

Melissa Oakley

cc: Brian Newman, IPG
Rick Carnell, IPG
James Leitheiser, IPG
Robert Harvey, Impact Compliance & Testing
Ms. Jenine Camilleri, Enforcement Unit Supervisor EGLE