

CURTIS METAL FINISHING COMPANY

ENGINEERED COATINGS • FASTENER FINISHING SPECIALISTS

February 4, 2019

Mr. Adam Bognar, Environmental Engineer
Air Quality Division
Michigan Department of Environmental Quality
Southeast Michigan District Office
27700 Donald Ct.
Warren, MI 48092-2793

RE: Curtis Metal Finishing (B6455), Violation Notice

Dear Mr. Bognar:

This is in response to your Violation Notice dated January 22, 2019. The test results from a report from H & H Monitoring indicated that control system did not achieve the minimum capture efficiency of 85% required by the permit. This was in result from a compliance test performed on October 18, 2018.

Curtis believes that back pressure in the ductwork related to the reversals in the internal RTO gas flow is the cause of the problem. The FGDIPSPINS2 RTO has a poppet valve design for flow reversals that is slower than the rotary design of Curtis' other RTO units. The back pressure manifested itself during the test as pulsing in the RTO and discrepancies in the inlet and outlet RTO flow measurements. These issues were also noted by Mr. Mark Dziadosz present with you during the test. FGDIPSPINS2 is comprised of two dip-spin coating lines. Line 18 is a standard design with a long and consistent history of achieving a capture efficiency similar to that required by the permit. However, Line 19 is a completely new design for Curtis from a new supplier. We believe that the pulsing is related to Line 19, but test results are a combination of the two lines, so more information is needed to determine an engineering solution to the problem.

Curtis is actively working with its suppliers and contractors to identify the specific reason for the back pressure and proposes to re-test the system as soon as possible. In the meantime, Curtis has limited operations on FGDIPSPINS2 to the application of Rule 621-compliant, water-based coatings only, until the capture efficiency issue is resolved. As a result of this operational limit, Curtis has and will continue to comply with all other emission limits applicable to FGDIPSPINS2 even when the tested capture and destruction efficiencies are used in the calculations.

Curtis is requesting an additional 180 days to identify and correct the issue that is causing the poor capture. At the end of that time Curtis will report the results of these efforts to the AQD and propose a schedule to correct and re-test or otherwise resolve the problem. During this time

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period, Curtis will limit operations of FGDIPSPINS2 to coatings with a VOC content less than 3.5 lb VOC/gallon, minus water, as applied and will not exceed permitted VOC emissions of 18 ton/year.

Please contact me at (586) 939-2850 Ext 362 or ajain@curtismetall.com if you have any questions or need any additional information.

Sincerely,



Ajay Jain
Environmental Manager

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Joyce Zhu, DEQ
Mr. David Scott, Curtis Metal Finishing

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