



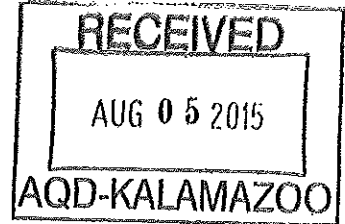
Post

305 Hoover Blvd, Suite 200
Holland, MI 49423
Ph: 616-928-9130
Fax: 616-928-9126

SENT VIA EMAIL and UPS

August 5, 2015

Mr. Dennis Dunlap, Environmental Quality Specialist
Michigan Department of Environmental Quality, Air Quality Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, Michigan 49009-5025



Regarding: Response to Violation Notice, Dated July 15, 2015
Fastener Coatings, Inc., Three Rivers, Michigan
SRN# N0760

Dear Mr. Dunlap:

Environmental Partners, Inc. has been retained to assist and respond to the above referenced violation notice (VN) resulting from the recent inspections at the Fastener Coatings facility in Three Rivers, St. Joseph County, Michigan. We have conducted a site inspection and records review and offer the following information to answer the noted violations. The Company response provided herein is in the same order as presented in the July 15, 2015 VN letter from your office. The VN requested a response by August 5, 2015 and as a result, this response is believed to be timely to that request.

AQD Notation 1:

Paint Burn-off Oven, SC 1.4, PTI 171-03, Circular chart records indicate that temperature dropped below 1400 degrees on numerous occasions.

Company Response:

The burn-off oven operates as a batch operation whereby parts to be burned-off are loaded into a cart, the cart is rolled into the oven, the door is closed and the oven cycle is started. We observed a complete burn-off cycle on July 22 and noted the desired temperature in the oven (approximately 710°F) was attained within approximately 25 minutes and the afterburner temperature was noted at 1,456°F which is above the required 1,400°F minimum. We also noted that no visible emissions (smoke) was noted in the stack during the burn-off cycle. The unit appears to be operating properly and appropriately with no excess emissions.

The burn-off oven utilizes a water mist and temperature profile program whereby the main pyrolysis chamber temperature is monitored and the temperature indicated on the front of the

unit. Should the rate of temperature rise in the main chamber be too rapid, the water mist is activated to prevent a flare-up of the combusted materials. We believe the short durations of temperature below 1,400 noted in the circular charts may be the result of the automatic and normal activation of the water mist and thus we assert the short term drop in the afterburner section are considered normal to the unit operation. We confirmed these findings with the unit maintenance contractor who will be performing the routine maintenance inspections and adjustments to the equipment. Please also note that differential loading and/or various coating racks with multiple coatings and variable build accumulations may influence the pyrolysis chamber reaction temperatures. We assert differing loads may result in differing profiles and temperature reactions by the unit.

Regardless of our findings for a normal operation, the Company has contacted the equipment maintenance service provider (used to maintain this equipment) to ensure the circular chart recording unit is properly calibrated and that the set point for the afterburner control temperature is maintained at or above 1,400°F. The operators will note each chart and will initiate a service call if the afterburner temperatures during normal operation (other than during the normal heat-up cycle) is below the set point of 1,400°F, or if other abnormal conditions of operation are observed.

AQD Notation 2:

Paint Burn-off Oven, SC 1.8a, PTI 171-03, Weekly records of visible emissions checks not kept.

Company Response:

The Company has reviewed the PTI requirement to perform weekly visible emission checks on the burn-off oven and will record these weekly. We note that no visible emissions have been or continue to be a problem for this source and we believe the staff refresher training on this element will help to prevent a reoccurrence of this recordkeeping deficiency.

AQD Notation 3:

Paint Burn-off Oven, SC 1.7, PTI 171-03. Verification of oven temperatures not performed every six months.

Company Response:

The main oven temperature and the afterburner temperatures are digitally displayed at the front of the unit and visible to the operators. To ensure the unit is operating properly, the operators take note of the operating temperatures in the oven. If the unit does not reach the desired burn-off temperature in the pyrolysis chamber, the coatings would not be removed and if the unit

overheated the racks, thermal deformation and damage would occur. As a result, the noted violation is believed to be a recordkeeping oversight.

The PTI requirement was reviewed with the unit operators and records documenting the verification of operating temperatures will be maintained every six months. Note also that a circular chart is used to record the afterburner temperature. The equipment service provider will be notified if problems with the unit operating temperature are discovered between scheduled maintenance events.

AQD Notation 4:

Coating booths, SC 5, PTI 216-00, Visible emissions seen coming from booth stacks.

SC 5 reads: The applicant shall not operate the spray booth portion of the emission units unless the respective exhaust filters are installed and operating properly. (R336.1301, R336.1331, R336.1901 and R336.1910).

Company Response:

As noted in the staff inspection report the filters were installed properly. According to Company staff, the AQD indicated that proper filters may not have been used. We inspected the dry arrestor type filters used by the company and note these filters are Chemco DuoMedia 20x20 dry arrestor filters and are intended to be used in paint booth applications such as that conducted by Fastener Coatings. We also found the filters to be installed properly, with no gaps or improper use of the filters were noted. We believe this is consistent with the AQD field inspection.

We reviewed the Part 9 (Rule 901 and Rule 910) provisions which require the proper application of control equipment, such as the use of dry arrestor filters in paint spray application booths, and note that Rule 901 and Rule 910 requirements appear to be met, despite the visual observation during some types of material spraying. We believe the noted visual emissions are at 5% or less as observed.

Permit 216-00 does not contain provisions prohibiting or restricting visual emissions from a spray booth during spray operation and thus we assert the Rule 301 provisions allowing up to 20% opacity would be allowed in this instance.

A review session was conducted with the spray department managers and the proper use and deployment of filters was discussed. The operators indicated filters are replaced on an as needed basis which is generally once per shift but may include more than one time per shift depending on the quantity of spray materials used. We note the spray volume of materials is quite low compared to some application equipment/processes and the bench style spray booths used at Fastener Coatings are monitored by both the spray staff as well as the floor manager for proper

filter deployment and use. As a result, we assert the dry type filters are, and have been, deployed properly.

AQD Notation 5:

Recordkeeping, SC 2, PTI 216-00, 12-month rolling time period calculation for combined spray booths not found.

Company Response:

The electronic records including the 12-month rolling time period are maintained offsite by EPI. A copy of the 12 month rolling data for the 12-month period ending in June,2015 are attached. These records indicate compliance with the 12-month limitations.

AQD Notation 6:

Recordkeeping, SC 3, PTI 216-00, 12 month rolling time period calculation for each spray booth not found.

Company Response:

The electronic records including the 12-month rolling time period are maintained offsite by EPI. A copy of the 12 month rolling data for the 12-month period ending in June, 2015 are attached. Historically the FGBG1 has been below 9 tons per year VOC and therefore by default each individual booth must also be below 9 tons per year. The records will be enhanced to show the 12-month rolling VOC sum for each booth. As it currently stands, the records indicate compliance with the 12-month limitations.

AQD Notation 7:

Recordkeeping, SC 4a and 4b, PTI 216-00, records for clean-up and purge solvents not found.

Company Response:

EPI reviewed the purge and clean up material purchases and waste shipments and was able to assemble the solvent clean-up and purge volumes for the painting operation. A copy of the summary for the first six months of 2015 is attached to this response. We also reviewed the PTI requirements with the paint preparation staff to ensure the recording of the clean-up solvent and waste shipment records. The clean-up and purge volumes have been incorporated into the recordkeeping system in accordance with the PTI requirements.

AQD Notation 8:

Recordkeeping, SC 1.4d and 1.4e, PTI 171-03, 12-month rolling time period calculations for each individual HAP and aggregate HAP not found.

Company Response:

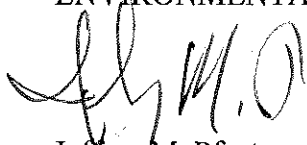
The electronic records including the 12-month rolling time period are maintained offsite by EPI. A copy of the 12 month rolling data for the 12-month period ending in June,2015 are attached. These records indicate compliance with the 12-month limitations.

Summary:

We believe the actions taken and the responses provide address each of the issues of concern noted in the VN and in the staff activity report. We also believe the actions and response provided are intended to prevent reoccurrence of the noted issues on an on-going basis. Most notable to this response, we assert the operation is not emitting compounds of concern above those allowed by the issued permit and associated regulations. If the response provided or the actions taken to prevent reoccurrence are not satisfactory to the AQD, we would like the opportunity to discuss any outstanding issues (for example a conference call) so that any misunderstandings can be clarified and a resolution may be sought.

The Company believes it can continue to operate its business within the existing air permits for the processes and equipment and remain a viable, small Michigan business. We greatly appreciate the courtesy extended to the Fastener Coatings staff. Please contact either Joy Garvey, at Fastener Coatings at 269-279-5134 or the undersigned at 616-928-9129 with questions.

Sincerely,
ENVIRONMENTAL PARTNERS, INC.



Jeffrey M. Pfof
Principal

cc: Joy Garvey, Fastener Coatings, Inc.
File