

December 10, 2018

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 November 14, 2018  
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 an evaluation of the data and a complete 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 November 14, 2018 VN letter from your office. The VN requested a response by December 5, 2018 for which we requested an extension to the deadline. The response deadline was subsequently granted and extended to December 12. As a result, this response is timely to the extended response deadline.

***AQD Notation 1:***

***Paint Burn-off Oven (EU-P02), SC VI.3 Permit No. 171-03A, Temperature record not being kept for the burn-off afterburner.***

**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. The operators have enhanced the record keeping to record the afterburner operating temperature at least once per batch operation.

***AQD Notation 2:***

***Paint Burn-off Oven (EU-P02), SC VI.2 Permit No. 171-03A, Records of calibration of the thermocouples of the burn-off oven were not available.***

Company Response:

Please see the attached certificate of calibration for temperature for this unit, attached. Further, the Company has engaged the services of Consolidated Controls to conduct recertification of the unit thermocouples on an annual basis.

***AQD Notation 3:***

***Coating Operation, SC VI.2.(a), (b), and (c) of FGFACILITY, Permit No. 171-03A. Some hazardous air pollutant (HAP) containing materials were not included in recordkeeping (Booth Strip, Polane B Clear, Polane Flattening Base, and Phoenix Colorant containing toluene).***

Company Response:

The Company reached out to the coating suppliers and secured new/updated SDS information for the various coating materials. Additionally, the recordkeeping system includes a mix sheet that is inherent to the emission recordkeeping program that documents the contents and tracks individual coating material constituents. A copy of the mix sheet is attached.

During the SDS update and review, enhancements were made to the monthly recordkeeping sheet to provide **clear** indication of booth coat usages and to properly document to ensure tracking of the VOC and HAP contents were also clearly included in the recordkeeping program. A copy of the November usage sheet and monthly summary sheets are included with the mix sheet showing the calculations are inclusive of the HAP and VOC content. We apologize for any confusion or shortcoming to the documentation, but also note the updates and enhancements did not radically change the emissions rates. Regardless, the monthly records from January 2018 to present have been updated and are considered accurate. No material usage changes are reflected in the updates and no excess emissions are noted.

***AQD Notation 4:***

***Coating Operation, SC 7, Permit No. 216-00. The VOC content Polane White and Polane Black was calculated to be higher than what is used in the recordkeeping sheets.***

Company Response:

As with the Company's response to Notation #3 above, the current material constituents and the usage mix ratios were updated and clarified. Please see the attached monthly recordkeeping, annual summary, and the material mix rate sheets, attached.

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.

One other notation with regards to the text of the VN is contained in Special Condition 7 of Permit Number 216-00 requiring the use of EPA method 24 for VOC content, unless prior approval is granted by the AQD District Supervisor. We note this language is boiler plate language in several VOC source air permits but is problematic in this instance since the coatings are used in small (usually quart aliquots), the Company uses a large number of coatings, the custom color nature of the operation, and the impractical application of testing each coating does not afford the use of EPA Method 24. Further to this requirement, the Company has always characterized and determined both the VOC and HAP content from a combination of manufacturers information along with mix ratio data for the color class of coatings.

In 2015, we provided notice to the U.S.EPA and to the MDEQ-AQD Kalamazoo District that the site was no longer subject to 40 CFR Part 63, Subpart HHHHHH (a.k.a. 6H, a.k.a.the area source coating MACT). The basis for this determination was made solely on the information and formulation data supplied by the paint manufacturer/supplier. An unsigned copy of the August 6, 2016 notice letter sent to the EPA regional office is enclosed.

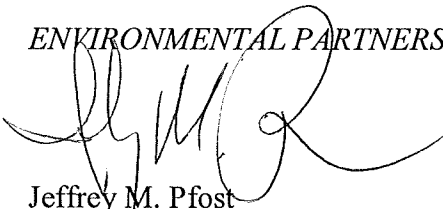
Since the Company has always used formulation data to report emissions, since air permitting has been conducted based solely on formulation and mix information, and since HAP content notices have been made based on formulation/mix information, the Company is requesting written acceptance of the use of formulation data from the AQD District for the continued use of VOC and HAP determinations. We believe that once the formal acceptance is made by the AQD District office, the issue of Method 24 testing will be alleviated.

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. Pfost  
Principal

Attachments (5)

cc: Joy Garvey, Fastener Coatings, Inc.  
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