

July 16, 2019

Mr. Chance Collins, Environmental Quality Specialist  
Michigan Department of Environmental, Great Lakes and Energy, Air Quality Division  
Kalamazoo District Office  
7953 Adobe Road  
Kalamazoo, Michigan 49009-5025

Regarding: Response to Violation Notice, Dated June 27, 2019  
Fastener Coatings, Inc., Three Rivers, Michigan  
SRN# N0760



Dear Mr. Collins:

Thank you for the quick email response yesterday (copy attached) requesting formal written response to the above violation notice (VN). The VN specifies that an EPA method 24 analysis is required for three designated coatings used at Fastener Coatings, Inc., (the Company). We have been in contact with the Company owner and we have made arrangements (taken actions to initiate) the collection, shipment and analysis of the samples to a suitable lab to conduct EPA Method 24. Sample containers have been shipped to the company location and we anticipate samples will be collected later this week by the Company. Shipment of the samples will follow collection. The paint samples require shipment via ground delivery to the lab located in North Carolina. The designated lab has extensive experience in performing EPA Method 24 and we have arranged for standard turn around. We anticipate final results in approximately 4 weeks. We will update your office when we have additional scheduling details as well as forwarding the final laboratory results when received from the lab.

Your email response also reiterated the need to complete and respond to each of the items in the VN. Our previous experience and attempts to explain the reasons the permit, the recordkeeping and the ongoing emissions reporting have all been based upon the formulation data and not on EPA Method 24 testing have gone unanswered. Despite our numerous requests to rely on the formulation data, and our updates and response actions following the October 2018 inspection, the AQD appears unwilling to provide approval for the use of formulation data. We believe the collection and analysis of the three representative paints will satisfy and complete the requirement as listed on the VN, Page 2 at paragraph 1, and we hope the continued use of formulation will be further validated with the Method 24 results.

The VN states this response should include the following:

***1) The dates the violation occurred***

Company Response:

The violation states the Company failed to conduct EPA Method 24 analysis as required by PTI 216-00. Arguably the data sheets supplied by the paint supplier are based upon QA/QC within their formulation shop prior to shipment to the Company. In our December 31, 2018 filing, we included environmental data sheets, which provides U.S. EPA and California (CARB) data on the coatings. As a practical matter, and as discussed verbally and in written correspondences with the AQD, the Company is again requesting the use of this supplier provided data for emission recordkeeping and reporting which is consistent. Once the use of formulation data is granted by the AQD District, the source will be in compliance with the PTI language.

The specification of “the period of violation” would indicate the problem has existed since the permit was issued and evidenced by the Company’s repeated request to use formulation data. This situation is further incomed by lack of a response from the AQD. The Company also feels the situation may have been further delayed and/or complicated by changes in AQD staff at the district office. As a practical matter and with regards to conducting Method 24, the sample collection and analysis will result in an end to the violation as noted, but leaves open the Company’s need and desire to have the AQD accept formulation data on an ongoing basis and for the targeted and the balance of coatings used at this location.

***2) An explanation of the cause and the duration of the violation***

Company Response:

In a discussion with AQD inspector Dennis Dunlap in December of last year, and following two responses we provided to him, dated December 10 and December 31, 2019, we were of the understanding the issue of tracking the VOCs and the use of formulation data was resolved using updated and enhanced information secured from the environmental data sheets. Historically, VOC emissions have (always) been compiled and tabulated using formulation data which, for 2 component paints, projects higher VOC losses than EPA method 24 coating VOC testing. Recently we conducted testing for a large scale, East Coast metal coating operation that uses Sherwin Williams materials in the same family as those used at Fastener Coatings. We suspected the facility was over-reporting VOCs since they too used formulation data. The EPA Method 24 results for that site indicated significantly lower VOC content than the formulation data (averaging approximately 20 less), consistent with our experience with other 2 component paint systems. We have learned that both Dennis and his supervisor Mary Douglas have retired from the Department and feel their departure may have contributed to a delay in responding to our latest (December 31, 2018) correspondence – as we have heard nothing from the AQD since they left.

Restated; our reasons we feel formulation data is a better means for VOC determination and tracking, and is more appropriate for this operation, are as follows:

- 1) Our experience with two component coatings has revealed that the **formulation data results in HIGHER VOC content** projections when compared with EPA Method 24 (Coating VOC content) testing. This is likely due to the pre-catalyzed nature of components that for purposes formulation VOC are identified as “volatile” but in fact are pre-reactants that become part of the polymer (solid) structure of the cured paints. Reported higher VOC emissions are part and parcel to historical record.
- 2) Historic permits and compliance have **used formulation data as the basis for VOC projections**, reporting and for compliance determination. Therefore; showing compliance with VOC emissions rates and thus are considered consistent with permitting strategies and ongoing VOC compliance.
- 3) Relatively small paint quantities are prepared and used on a daily and monthly basis in all booths – typically in units of quarts. To date, the operation **would otherwise qualify for the 200 gallon exemption** for each coating booth, but for the existing air permit which also limits HAP emissions for the site. EPA Method 24 analysis is not required for small exempt operations that rely on Rule 287(2)(c) exemptions.
- 4) Fastener Coatings coats small screw heads by custom blending colors to match the customer application. This involves **the use of numerous tints in the “mixed” Polane** portion of the operation, making testing of the mixed Polane materials unpractical and overly burdensome with no apparent value or gain.
- 5) In 2015, demonstrations of applicability (the site is no longer applicable to Area Source NESHAP 6H) were made to the AQD District and **to U.S. EPA on the basis of formulation data**, which is an allowed method under the NESHAP 6H demonstration.
- 6) The EPA VOC content testing that is being requested by the AQD **will be costly** (approximately \$200) per sample, will be applicable to that batch, that specific color (as mixed by the lab) and the results will have limited applicability or comparative value for historical or future colors in the same class. Therefore, it is our opinion and conclusion that such EPA testing is of limited value for compliance or reporting purposes and does not provide the concrete evidence the AQD may be seeking. Conversely, the compliance VOC tracking and reporting based on formulation data provides stable and consistent VOC information to ensure ongoing compliance with the air permit. Fastener Coatings is a small, woman owned business that does not have the funds to throw at testing that will not provide a value added means of compliance demonstrations or reporting.
- 7) Formulation data is the means for tracking VOC emissions on most new and existing painting sources, simply based on the numerous colors and formulations that painters are required to use in order to be effective in their service to their customers.

The identification of the “period of violation” is incomed by the Company’s repeated request to use formulation data, along with the AQD not acting upon those requests. As a practical matter and with regards to conducting Method 24, the sample collection and analysis will result in an end to the VN notation, but leaves open the Company’s need to have the AQD accept formulation data on an ongoing basis for the numerous coatings used in this operation.

The specific question regarding the “cause and duration” does not exactly fit this situation, but the reasons to use formulation data versus EPA Method 24 have been outlined above. The duration implies an event or episodic situation; however, in this case, the stated violation relates to the basis of the emissions calculation and how data is collected on an ongoing basis.

**3) *Whether the violation is ongoing***

Company Response:

As described above, this is a data management and reporting situation that does not fit a “repeated” event or exceedance. The most accurate response is that formulation data has been used in lieu of EPA Method, or in the form of specific coating information provided by the paint supplier. In preparing the QA/QC data for the Company’s use, the formulator may have based the report on EPA Method 24, indicating that the condition was actually complied with. If not, the “circumstances” related to this VN have been ongoing since the permit was issued. We note the Company carefully summarized and tabulates the VOC emissions and has complied with emissions limitations and restrictions by a sizable margin, and we assert there is no evidence that indicates the violation has resulted in any single or in an ongoing excess emissions situation.

**4) *A summary of the actions that have been taken and are proposed to be taken to correct the violation***

Company Response:

The first page of this correspondence describes the initiation of sample collection to “correct” or address the violation. Please refer to that description.

**5) *Dates the by which these actions will take place***

Company Response:

The first page describes that today, sample collection containers have been sent to the Company for collection. It is anticipated that shipping containers, sample collection, shipment to the lab, standard lab turn-around, and reporting back to the Company will take approximately 4 weeks in total. Four weeks from today (July 16) is August 13, 2019. We will commit to either 1) having the results of the Method 24 analysis submitted to your office, or 2) will provide an update no later than end of business, August 13, 2019.

**6) *What steps are being taken to prevent a reoccurrence.***

Company response:

This situation involves a one-time analysis and thus this question does not apply to this situation or the specified VN.

Please contact either Joy Garvey, President, Fastener Coatings at 269-279-5134 or the undersigned at 616-928-9129 with questions.

Sincerely,

*ENVIRONMENTAL PARTNERS, INC.*

A handwritten signature in black ink, appearing to read 'J. M. Pfof', written over the company name.

Jeffrey M. Pfof  
Principal

Attachment (1)

cc: Joy Garvey, President Fastener Coatings, Inc.  
Ms. Mary Ann Dolchanty, EGLE AQD Director  
Mr. Jay Olaguer, Assistant Division Director, EGLE AQD  
Ms. Jenine Camilleri, Enforcement Unit Manager EGLE AQD  
Mr. Rex Lane, District Supervisor, EGLE AQD  
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