EPI
Environmental Partners Inc.

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

July 31, 2019

Mr. Chance Collins, Environmental Quality Specialist
Michigan Department of Environment 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 – Supplemental Information
Fastener Coatings, Inc., Three Rivers, Michigan
SRN# N0760

Dear Mr. Collins:

Environmental Partners, Inc. has received the results of EPA Method 24 paint testing for Fastener Coatings in Three Rivers, Michigan. The information in this supplement should accompany the July 16, 2019 response for completeness and to put closure to outstanding issues included in our Response 5 on Page 4 of 5 of that response.

Today we received the results of paint sampling and VOC analysis performed by RTP Laboratories, located in Raleigh, North Carolina. As we anticipated and reported in our July 16 response, the actual VOC content of the materials, as mixed, are less than the theoretical values used to track and report VOC emissions from the facility. The analytical results are attached for your files. A summary of the results is included in Table One.

Table One: EPA Method VOC Content
Fastener Coatings, Inc.
Three Rivers, Michigan

Sample Description (as mixed)	EPA Method 24 Results			Formula VOC content (lbs./gal)
	% VOC wt.	Density lb/gal	Lb VOC per gal	
Polane Black	68.9	7.15	4.93	5.5
Polane White	48.2	8.93	4.30	5.2
Polane Mixed Base	49.4	7.66	3.78	5.8

As can be seen from the testing result, all EPA Method 24 results are lower than the formula VOC content used for tracking and reporting purposes. This indicates the methods used by the Company to track and report emissions showing compliance with the permit provisions were justifiable. The historical means for quantifying emissions also over-stated actual emissions by an adequate margin of safety. We again opine the theoretical VOC contents used at this location were the basis for the existing air permit, for the historical tracking system, for the annual MAERs reporting requirements, and for previous compliance demonstrations for and by the AQD.

With this demonstration complete and with the Method 24 results in hand, we again request the ***written approval of the District Supervisor*** to use formulation data from the suppliers, along with the mix ratios used to prepare the paints as the means for demonstrating compliance with the issued PTI. We look forward to closure of the VN on that basis and request confirmation there are no lingering or outstanding issues of compliance.

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

Attachment (1)

cc: Joy Garvey, Fastener Coatings, Inc.
Ms. Mary Ann Dolehanty, 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
File

Research Triangle Park Laboratories, Inc.
7201 ACC Blvd., Suite 104
Raleigh, NC 27617

919 510-0228 Telephone
919 510-0141 Fax
Web Site: www.rtp-labs.com

RTP Labs
ISO 17025 Compliant
PA Registration #68-1664
DEA Registered

July 30, 2019

Environmental Partners Inc.
305 Hoover Blvd., Suite 200
Holland, Michigan 49423

Attn: Jeffery Pfost

PROJECT: VOCs Testing –Report of VOC Tests.
RTP Labs ID: 19-055

Enclosed with this letter is the report for the samples received on July 23, 2019 from Fastener Coatings, Inc. We received three samples of paint products (Part A paint, Part B catalyst, Part C MEK) in good condition. Each sample part A, part B and Part C were mixed according to the instruction provided (0.675:0.045:0.28) and were tested for percent VOCs and percent solids according to EPA Method 24.

The test results are summarized in the attached table.

If you have any questions, please give me a call at (919) 510-0228.

Sincerely,

Alston Sykes

Alston Sykes, Principal Chemist

Attachments: Chain-of-Custody Forms; attachment

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Laboratory Report

Client: Environmental Partners
Client Project: EPA Method 24 VOCs
RTP Labs Project: 19-055
Date Received: July 23, 2019

EPA Method VOCs Content

Sample Description	% VOCs By Weight	% Solids By Weight	Density	
			gm/mL	lb/gal
Polane Black Parts Mixed 0.675 Paint:0.045 catalyst:0.28 MEK	68.9	31.1	0.86	7.15
Polane White Parts Mixed 0.675 Paint:0.045 catalyst:0.28 MEK	48.2	51.8	1.07	8.93
Polane Mixed Base Parts Mixed 0.675 Paint:0.045 catalyst:0.28 MEK	49.4	50.6	0.92	7.66

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Chain of Custody Record

Research Triangle Park Laboratories, Inc
7201 ACC Blvd., Suite 104
Raleigh, North Carolina 27617
Phone: 919-510-0228 Fax: 919-510-0141
Web Site: www.rtp-labs.com
email: CustomerService@rtp-labs.com

ISO 17025 Compliant/DEA Registered Analytical Lab

RTPLabs

Client (Billing for Credit Card): JEFF PFOST, ENVIRONMENTAL PARTNERS
Company or Name on Report: RE: FINISHED COATINGS
Phone # (Required): 616-218-8353
Fax #:
Date: 7/18/2019
Address: 305 HOOVER BLVD Suite 200
E-Mail (Required): jeff.pfost@enviro-partners.com
Page 1 of 1
City: HOLLAND
State: MI
Zip Code: 49423
Contract/PO#/Credit Card #/Expiration Date/CVV#:
Contact Name: JEFF PFOST
Requested Analyses
(RTP Labs Use) Project Number ID: 19-055

	Additional Info or Comments: / Sample Description/Batch/Manf Date	Sample Date	TIME AM PM	Matrix: Air Ambient	Air Source	Liquid/Solid	EPA Compliance	Preservatives	# of Containers	METHOD 24 VOC content	Environmental Air Samples Only (Summa Canisters) Field Initial Inches Hg or psig	Field Final	Lab Receipt	Lab Fina psig	RTP Labs Sample or Fraction ID
1	POLANE BLACK									X					01
2	POLANE WHITE									X					02
3	POLANE MIXED BASE									X					03
4	POLANE B CATALYST									X					
5	MEK THINNER									X					
6															
7															
8															
9															
10															

Turn Around Time Requested for Analysis: Business days after having received samples with completed documentation; *Rush Multipliers (Xx)
☒ Normal 15 days ☐ 10 days*(1.5x) ☐ 5 days*(2.0x) ☐ 3 days*(3x)

Data Package: Std ☐
Raw Data Deliverable: ☐ 1.1x surcharge

QC Requirements: Screen ☐ Standard ☐
EPA Level IV Compliance ☐
Requires approved QAPP sent to lab

Signature:	Date:	Time:	Received By (RTP Labs):	Date:	Time:
J-TL	7-19-19	1205 pm	A. Sykes	7/23/19	1:00

By submitting samples you agree to RTP Labs' Terms & Conditions and that you are following Federal hazardous & controlled substances regulations.

Chain_RTP2018 revision 10/1/2018