



RECEIVED
AUG 24 2023

August 21, 2023

Via Certified Mail:

AQD - KALAMAZOO

Michigan Department Environmental Quality (EGLE)
AQD, Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009
Attn. AQD District Supervisor

Re: Modineer Coatings Division - North (171-22)
August 3, 2023, Rule 201 Violation Notice

Dear Sir or Madam:

The following is our response to the EGLE August 3, 2023, Rule 201 Violation Notice.

Dates violation occurred – Monthly volumes exceeded 200 gallons of e-coat material from July 2016 through July 2018 and from November 2018 through July 2023. Modineer Coatings Division – North, formerly Summit Industrial Coating, was purchased and finalized on July 21, 2015. Unfortunately, there are no usage or inventory records prior to July 2016. We are unable to confirm compliance with Rule 201 from August 21, 2015, through June 30, 2016.

Explanation of the causes and duration of the violation – Modineer was led to believe that the entire facility; including the e-coat paint line, were exempt from permitting during the purchase of the company from Summit Industrial Coatings and unfortunately unaware of the specifics for Rule 201 requirements. Excluding August, September and October 2019, all available records since the August 21, 2015, purchase, Modineer Coatings Division exceeded monthly paint usage limits of 200 gallons or less per month and the violation is ongoing.



Summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place –

Modineer Coatings Division – North submitted a PTI permit for an e-coat line, powder coat line, burn-off oven and shot blast process to EGLE on August 14, 2023. Pending review and final determination by EGLE, Modineer Coatings Division shall submit a ROP Permit application as needed and / or conduct any regulatory requirements for recordkeeping and monitoring of the current process.

Steps taken to prevent re-occurrence – Moving forward, we will not begin to install, install, or operate any new processes without obtaining a PTI permit for said additions.

Should you have any questions or require any additional information please feel free to contact Mark Weaver at your earliest convenience via e-mail at mweaver@modineer.com or by phone at (269) 357-7393.

Respectfully,

Allen Pixley

Chief Operations Officer (COO)

Modineer Company

CC: Bruce Chambers

Kevin McIlivane

Keith Belew

Mark Weaver

Rachel Benaway, EGLE AQD Environmental Quality Analyst

Jenine Camilleri, EGLE Enforcement Unit Supervisor

P.O. Box 30260, Lansing, MI 48909-7760