

JUL 19 2017

July 13, 2017

Mr. Nathan Hude  
MDEQ-AQD  
Lansing District Office  
Constitution Hall  
525 West Allegan  
Lansing, Michigan 48909

Re: Response to Second Violation Notice Letter  
Grupo Antolin (SRN: N2198)

Dear Mr. Hude:

This letter is in response to a second violation notice letter dated June 15, 2017 from you (received June 22, 2017). This June 15, 2017 letter was a response to our initial response letter dated May 8, 2017, in which we addressed the concerns of your initial violation notice letter, dated April 6, 2017. This most recent letter itemizes into a violation letter, a request for further documentation, which wasn't requested in the initial violation notice.

We trust that this response letter will answer the many follow-up questions you have.

1. **FG-FORMINGLINE** – Your recent letter acknowledges that this violation has been resolved and therefore no further information is requested or provided by this response letter.
2. **FG-WATERTRIM** – Our initial response was that the company would comply with Michigan Rule 286(2)(l)(vi)(c) by installing a fabric filter collection device in the exhaust duct leading to the current discharge point. After evaluating the feasibility of installing a fabric filter collection unit on the Watertrim process, the company has instead decided to address the current discharge arrangement through an air permit application for the Watertrim process. The company intends to have an application submitted by August 31, 2017.
3. **EU-SKINLINE** – Your recent letter acknowledges that this violation has been resolved and therefore no further information is requested or provided by this response letter.
4. **EUPACKAGETRAY** – Your second letter requests that we specifically identify which portion of Michigan Rule 290 that the company is claiming for its air permit exemption and to provide a description of the process and emission records covering calendar year 2016.

EUPACKAGETRAY is a waterbased glue application station installed in 2011. The process applies a waterbased glue to a cotton shoddy substrate using a conventional spray applicator. A cloth blanket is set on top of the glued substrated and the combined part is inserted into a form tool where it undergoes heat and pressure to set the glue.

The operation was installed under Michigan Rule R 336.1290(a)(i)&(ii). We will be submitting or have submitted an electronic copy of the 2016 record keeping, which provides emissions data for each emission unit, for each individual month in 2016, along with a 12 month summary table.

5. **FG-REACTINMOLD** – Your most recent letter acknowledges that this violation has been resolved and therefore no further information is requested or provided by this response letter.
6. **FG-RURTLINE** - Your most recent letter acknowledges that this violation has been resolved and therefore no further information is requested or provided by this response letter.
7. **FG-LAMBDA967&968** – Your second letter requests that we specifically identify which portion of Michigan Rule 290 that the company is claiming for it's air permit exemption and to provide a description of the process and emission records covering calendar year 2016.

Lambda 967 & 968 are two separate emission units under a common flexible group that spray apply a 2-component waterbased adhesive to the assembly parts for a door trim component. The application process is conducted in an open area of the plant floor with emissions being released to the general in-plant environment.

FG-LAMBDA967&968 flexible group was installed in 2009 under Michigan Rule R 336.1290(a)(i)&(ii). This same operation was removed from service May 10, 2017. Per your request we will be submitting or have already submitted an electronic copy of the 2016 record keeping, which provides emissions data for each emission unit, for each individual month in 2016, along with a 12 month summary table.

8. **EU-C1** - Your second letter requests that we specifically identify which portion of Michigan Rule 290 that the company is claiming for it's air permit exemption and to provide a description of the process and emission records covering calendar year 2016.

EU-C1 was installed in 2017 as a replacement for FG-LAMBDA967&968. The process was installed under Rule 290(2)(a)(i) & (ii). The process spray applies a 2-component waterbased adhesive to assembly parts. The application process is conducted in an open area of the plant floor emissions released to the general in-plant environment.

This process was installed early this year (2017), and therefore the requested 2016 record keeping data does not include any records for this process. However, in re-evaluating this process, the company has noted that this particular operation will require the use of a cleaning solvent that contains a carcinogen. Since it is possible that the use of the cleaning solvent may result in a carcinogen emission greater than 20 lbs in a single month, the company has decided to address this process through an air permit application process. The company intends to have an application submitted to the MDEQ-AQD Permit Section by August 31, 2017.

## **EU-PAINT**

The Violation Notice letter makes several allegations against compliance with the requirements of EU-PAINT. The following is our response to allegations 9 – 14.

9. **Malfunction Abatement Plan (MAP)** – Your recent letter requested that updates be provided to the submitted Malfunction Abatement Plan. The updated document is being provided as a separate document under this submission.
10. **Differential Pressure at Natural Draft Openings (NDO)** – Your most recent letter acknowledges that this violation has been resolved and therefore no further information is requested or provided by this response letter.
11. **HVLP Test Caps** – Your most recent letter acknowledges that this violation has been resolved and therefore no further information is requested or provided by this letter.
12. **Temperature Chart Recorder** – Your recent letter requested that temperature recordings from the data logging system be provided for review by the Department. A table downloaded into an Excel spreadsheet has been provided with both differential pressures and combustion temperatures.
13. **Record Keeping** – The DEQ letter requested for an anticipated date for full production and when the spreadsheet will be developed to accommodate paint/solvent usage. By the end of August the paint line should be operating near 60% of maximum anticipated levels, with peak production beginning in September.

A copy of the 2016 record keeping spreadsheet will be electronically submitted. The spreadsheet was developed to meet the air permit requirements. Purchase data was used for 2016 data.

14. **Recording of Differential Pressures at (NDO)** – Your letter noted the need for documentation of the NDO differential pressure drops. The data logging system has been upgraded to include both entrance and exit NDO pressure drops. A copy of the data is included with this letter.
15. **FG-FACILITY** – The recent DEQ letter requests for an anticipated date for full production and when the emission record keeping system will be operational for documenting Hazardous Air Pollutant (HAP) emissions. The paint line production has been answered in item 13 above and the same record keeping spreadsheet identified in 13 also records HAP data. Again, data for 2016 involves purchase data, which we believe to be a worst case scenario.

Mr. Nathan Hude, MDEQ-AQD

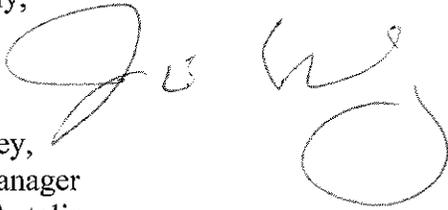
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16. **Potential-to-Emit** – Both the April 6, 2017 and June 15, 2017 letters from the MDEQ requested that we provide a Potential-to-Emit (PTE) demonstration for all pollutants. We apologize for missing this part of the initial letter but an electronic copy of the PTE analysis will be or has been submitted to you as part of this response.

We trust that this fully addresses your concerns. However, we wish to continue with our open dialogue and should you have additional questions, please direct them to me either by e-mail at [jim.ulrey@grupoantolin.com](mailto:jim.ulrey@grupoantolin.com) or by telephone at 517-672-0393.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jim Ulrey', with a large circular flourish at the end.

Jim Ulrey,  
EHS Manager  
Grupo Antolin

cc: Ms. Lynn Fiedler, MDEQ-AQD  
Ms. Mary Ann Dolehanty, MDEQ-AQD  
Mr. Chris Ethridge, MDEQ-AQD  
Mr. Thomas Hess, MDEQ-AQD  
Mr. Brad Myott, MDEQ-AQD