

August 3, 2017

Hello Matt,

This document is a response to the violation notice that has been brought to our attention during a surprise walkthrough of the facility that belongs to NCP Coatings Inc. (NCP), located at 225 Fort St. in Niles, Michigan.

The inspection occurred on June 20th, 2017 at approximately 10 a.m. and was conducted by Matt Deskins, Michigan Department of Environmental Quality. The discrepancy found was with a machine used for cleaning large portable mixing tanks used in the coating manufacturing process. NCP operates an emission unit, EUTOTECLEAN, with defined operating parameters, and has operated within these parameters for the life of the permit. NCP has initiated adding an additional piece of equipment, with the understanding that the permit allowed equipment changes provided the changes would not exceed the permitted operating parameters and that the equipment changes were recorded (FGFACILITY).

The inspector did not agree that the permit allowed this equipment change without a Permit to Install, stating that installation of new equipment that will produce emissions to the atmosphere requires a Permit to Install be submitted to the DEQ Air Quality Division.

The following actions are in place to correct the violation;

- Training for personnel who deal with potential installations.
- Installation of the portable cleaner has been halted until further notice.
- NCP is working with ERM to complete the permit to install paperwork (submittal as soon as practicable).
- Machine will not be used until after NCP has received approval for operation.

NCP Coatings Inc. is committed to manufacturing a great product for our customers, but also takes compliance very seriously.

Respectfully,

Chris Thompson


Environmental, Health & Safety Director
NCP Coatings Inc.

