

Matt



**TOEFCO ENGINEERED COATING SYSTEMS, INC.**

1220 North 14<sup>th</sup> Street • Niles, MI 49120 • (269)-683-0188 • (800)-555-6495 • Fax (269) 683-8408



June 29, 2018

Mr. Matt Deskins  
Environmental Quality Analyst  
Michigan Department of Environmental Quality  
Air Quality Division  
Kalamazoo District Office  
7953 Adobe Road  
Kalamazoo, Michigan 49009-5025

**RE: RESPONSE TO THE JUNE 4, 2018 VIOLATION NOTICE ISSUED TO TOEFCO ENGINEERED COATING SYSTEMS, INC.;**  
**SRN: N2610**

Dear Mr. Deskins:

Toefco Engineered Coating Systems, Inc. ("Toefco") is in receipt of the June 4, 2018 Violation Notice issued by the Kalamazoo District Office (the "District") of the Michigan Department of Environmental Quality, Air Quality Division ("AQD"). The Violation Notice cites Conditions 19 and 23 of Section A of Renewable Operating Permit No. MI-ROP-N2610-2017 (the "ROP"), which requires the responsible official to submit a report at least once every six months of all instances of all instances of deviations from ROP requirements, and also to certify at least annually, in writing to AQD, that the stationary source has been in compliance with all terms and conditions contained in the ROP, except for any deviations that have been or are being reported to AQD. The two respective reports noted were to have been postmarked or received at District AQD by March 15, 2018, but were not received until May 31, 2018.

Pursuant to your subsequent request via telephone call, Toefco is providing this response to AQD. The delay in submission of the two noted reports was purely an oversight of schedule and delegation responsibility among the ROP compliance team for the facility, due to the recent nature the ROP issuance to the stationary source. Toefco's 14<sup>th</sup> Street facility had long operated under a Permit to Install issued by AQD that did not require periodic reporting. Upon discovery of the oversight, Toefco immediately prepared and submitted the appropriate semiannual deviation report and annual certification report. It should be noted that the only



deviation reported for the semiannual period covering July 1, 2017 through December 31, 2017 was the continuation of a visible emission recordkeeping issue that had been initially reported in the previous semiannual report and corrected in the early portion of the noted semiannual period, and this recordkeeping issue was the only deviation noted in the annual certification report.

Toefco, in conjunction with Barr Engineering Co., its environmental consultant, has initiated corrective activities to minimize the chance of future reporting date oversight. Activities include inclusion of reporting date reminders and deadlines in the facility compliance calendar, additional training regarding the ROP reporting requirements for applicable compliance team members, and delegation of primary and backup responsibilities for the applicable reporting requirements. Toefco believes that these activities will preclude future reporting disruption.

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Should you have any questions or need additional information, please feel free to contact Mr. Brian Greenwald of Barr Engineering at (616) 512-7012, or me at (800) 555-6495, at your convenience.

Sincerely,

**TOEFCO ENGINEERED COATING SYSTEMS, INC.**

Artie McElwee III  
President

c: Ms. Mary Douglas, AQD  
Mr. Christopher Ethridge, AQD  
Mr. Brian Greenwald, Barr Engineering

