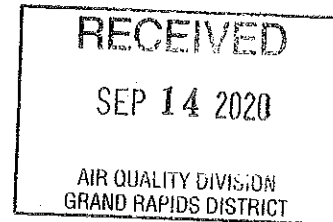




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September 11, 2020

Ms. April Lazzaro  
EGLE – Air Quality Division  
Grand Rapids District Office  
350 Ottawa Avenue, NW Unit 10  
Grand Rapids, MI 49503



**re: A&K Finishing (SRN N5155)  
Violation Notice of August 25<sup>th</sup>**

Dear Ms. Lazzaro,

A&K Finishing is in receipt of your Violation Notice of August 25<sup>th</sup> alleging a violation of special conditions of PTI No. 21-07D.

You have requested that actions be initiated to correct the alleged violations and have also requested a written response by September 15, 2020. You have indicated that the written response should include the dates that the violations occurred, an explanation of the cause and duration of the violation, whether the violation is ongoing, a summary of the actions that have been taken and are proposed to be taken to correct the violation and that dates by which these actions will take place, and what steps are being taken to prevent a reoccurrence.

*EU-Line4 Rule 632 – Exceeded 5.0 lb/gal (minus water) as applied daily volume-weighted average VOC limit on 60 days from February-June 2019.*

A&K Finishing operated under PTI No. 21-07C during this period. EU-Line4 was not subject to Rule 632 under PTI NO. 21-07C as it was desired to utilize relatively higher VOC containing coatings on this line and it was permitted as exempt from Rule 632. Unfortunately, February VOC emissions exceeded 2,000 pounds and A&K Finishing promptly proceeded with the preparation and submittal of a permit application to address this issue. PTI No. 21-07D was issued in July and the facility began operating in compliance with the Rule 632 emissions limit.

*EU-Line2 Rule 632 and PTI No. 21-07D, FG-COAT, Special Condition 1.6 – Exceeded Rule 632 lb/gal (minus Water) as applied daily volume-weighted average VOC limit on February 2, 2020.*

I believe the date in question is February 10<sup>th</sup> and not February 2<sup>nd</sup>. Usage on Line 3 on February 10, 2020 was a single coating, SWA GB30BM30127. The VOC content (minus water) of this material is 5.92, more than the allowable VOC content of 5.75. However, the usage of 3.17 gallons of catalyst with this coating was not included in the calculations. When adding in the catalyst, the average VOC content is reduced to 5.73 which is below the red/black limit for this line of 5.75.

*EU-LINE4 PTI No. 21-07D, FG-COAT, Special Condition 1.7 – Exceedance of 12.9 lbs/yr 12-month rolling cumene emission limit.*

The coating used on this EU-LINE4 that contains cumene is Red Spot 379S94A. This material originally had a cumene content of 1% by weight. It became apparent that the facility would not be meeting this limit due to the cumene content. To address this issue, the coating was reformulated to reduce the cumene content to 0.1% by weight. The newly reformulated coating was used beginning in October 2019. The process to gain approval to use this coating required the material undergo extensive testing to demonstrate to our customer that the new formulation would not cause quality problems. This approval process took several weeks and is the reason that the new formulation could not be used immediately. We anticipate coming back into compliance with the annual cumene emission limit after September 2020 and will remain in compliance moving forward.

*FG-COAT PTI No. 21-7D, FG-COAT, Special Condition I.5 & I.6 – Failure to properly report as applied VOC content.*

Currently, reporting is done on an “as received” basis. We will be preparing a list of current coatings and their respective formulae (thinners and catalysts) and determine instantaneous VOC content for all active coating. We will also be creating a new recordkeeping workbook that uses these “as applied” VOC contents. We will be using the new workbook for all permit recordkeeping beginning in January 2021.

*FG-COAT, PTI No. 21-07D, FG-COAT, Special Condition V.1 – Failure to determine VOC content from formulation data as approved.*

A&K Finishing had previously received approval from EGLE to conduct Method 24 sampling and testing on a representative portion of coating. This testing had been conducted to ensure that coatings were tested that constitute 50% of VOC emissions. This testing is typically done at the beginning of the year after the previous calendar year emissions have been finalized.

We have been using a combination of MSDSs, SDSs and EDSs to determine VOC content for coatings that have not been Method 24 tested. We are currently in the process of requesting EDSs exclusively to determine VOC content from coatings that have not been Method 24 tested.

Moving forward, if the above protocol is no longer acceptable, A&K proposes to utilize Environmental Data Sheets (EDSs) in lieu of MSDSs, SDSs or Method 24 testing.

*EU-Line4, Rule 201, Use of new coatings without PTI. Meaningful change demonstration not acceptable.*

The new coating used on EU-LINE4 was AWHP-9307 and its catalyst, V66XXV13838. Volatile components of these materials include 2-Butoxyethanol, n-Methylpyrrolidone, Diethylene Glycol Monobutyl Ether, Triethylamine, n-Butyl Acetate and Hexamethylene Diisocyanate. None of the usage of these compounds resulted in a meaningful change. The AWHP coating also contains carbon black which is not a volatile (solid) and not. The catalyst also contains Hexamethylene Diisocyanate Polymer which is also a solid and not emitted.

It appears that EGLE believes that the Hexamethylene Diisocyanate **polymer** in the catalyst is a volatile. However, resins are not evaluated by EGLE as part of the permit process as they are solids that would not evaporate. The inspection report indicates the “several” other air toxics should have been included. A&K Finishing is requesting the EGLE identify the “several” other air toxics that should have been included other than pigments or resins.

*FG-FACILITY, PTI No. 21-07D, FGFACILITY, Special Condition II.1 – Exceeded maximum VOC content with water as applied limit.*

As noted above, the VOC content is based on “as received” materials. We will be preparing a list of current coatings and their respective formulae (thinners and catalysts) and determine

instantaneous VOC content for all active coating, both with and without water and exempt coatings. If any coatings are above the maximum VOC content, with water, as applied, the coatings will be either reformulated or a permit amendment application will be prepared.

*FGFACILITY, PTI No. 21-07D, FGFACILITY, Special Condition V.1 and V.2 – Failure to determine HAP and VOC content from formulation data as approved.*

As noted above, A&K Finishing had previously received approval from EGLE to conduct Method 24 sampling and testing on a representative portion of coating. This testing had been conducted to ensure that coatings were tested that constitute 50% of VOC emissions.

We have been using a combination of MSDSs, SDSs and EDSs to determine VOC content for coatings that have not been Method 24 tested. We are currently in the process of requesting EDSs exclusively to determine VOC content from coatings that have not been Method 24 tested.

Moving forward, A&K proposes to utilize Environmental Data Sheets (EDSs) in lieu of MSDSs, SDSs or Method 24 testing.

I hope that the information provided is acceptable but please let me know if you have any questions and thank you for your time and cooperation in this matter.

Sincerely,

Scott Hankamp  
General Manager

