



File Man  
N5677

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E-file: N5677-RVN-20140819  
August 19<sup>th</sup>, 2014

**RE: MDEQ Violation Notice**

Mr. Iranna Konanahalli  
Southeast Michigan District Office  
27700 Donald Court  
Warren, Michigan 48092

IK  
CJE  
dc

Dear Mr. Konanahalli,

July 29, 2014, UN Response

This letter is in response to the violation notice EO Rochester Hills received following your inspection on June 27, 2014.

The violations being addressed are:

1. Failure to keep VOC records and calculate emissions beyond December 2013
2. Installation of new equipment
3. R&D equipment being utilized for low volume production

The date of the R&D equipment violation is from the summer of 2012, this is when production resumed at the Rochester Hills facility. The R&D lines were occasionally being used to supplement production during 2<sup>nd</sup> shift operations. Our plan is to continue to utilize these lines as a mixed mode production model to allow us the flexibility needed to meet our customers' demand.

In January 2013, and April 2014 new coating lines were installed without the required update to the air permit. A new Permit to Install (PTI) has been completed and is being mailed today August 19, 2014. In addition members of the Rochester Hills team are taking a PTI workshop in Lansing this September via Mary Ann Dolehanty's (MDEQ Air Quality Division) recommendation, to better learn and engage the process to avoid future violations.

The records and calculations of VOC emissions in regards to the 2014 violation occurred on January 2014. The chemical usage information was available; however the emissions were being updated as needed in preparation for our MAERS reporting. These emissions are now being calculated to ensure Eagle Ottawa, Rochester Hills is current and in compliance with MDEQ as well.

It was also mentioned during our meeting that the time we are allowed to calculate emissions is being reduced to a monthly requirement. We will set this time as our new deadline for completing emissions data.

We are committed to have these violations corrected as soon as possible, three weeks prior to your visit our team was reaching out for assistance in an effort to be proactive, once the issue with the Permit to Install was realized. In addition to this response letter, all of the required data to submit the Permit to Install has also been collected for MDEQ review, and approval.

Thank you for educating our team towards the path of compliance. Through working together we will become more prepared to better utilize this knowledge from our lessons learned, to remain current and meet air permit requirements / regulations.

Regards,

A handwritten signature in black ink, appearing to read "Tim Reedy". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Tim Reedy  
General Manager

Emission Unit ID	VOC in coating	lbs/hour	hours/year	lbs VOC/year	Tons VOC/year
SP1	8.89%	310	8760	241416.84	120.70842
SP2	8.89%	310	8760	241416.84	120.70842
SP3	8.89%	170	8760	132389.88	66.19494
SP4	8.89%	170	8760	132389.88	66.19494
SP5	8.89%	310	8760	241416.84	120.70842
SP6	8.89%	310	8760	241416.84	120.70842
ProdTopStar	12.61%	170	8760	18778.812	9.389406
ProdJumboStar	12.61%	95	8760	10494.042	5.247021
ProdMegaStar	12.61%	95	8760	10494.042	5.247021
NatallerRC1	12.61%	76.8	8760	8483.60448	4.24180224
NatallerRC2	12.61%	76.8	8760	8483.60448	4.24180224
PD MegaStar	12.61%	95	8760	10494.042	5.247021
PDStarPrint	4.84%	5	8760	2119.92	1.05996
<b>649.8975935</b>					<b>Total Tons</b>

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Southeast Michigan District Office  
27700 Donald Court  
Warren, Michigan 48092

Dear Mr. Konanahalli,

In regards to our Potential to Emit calculations, our last year's emissions were in the 20-30 ton range and we feel strongly that a major increase in production would not bring us above our current permit's 67 tons-per-year limit. While I believe the calculations were done properly as described in the regulations, due to significant machine downtime while cleaning and changing material there is no way we would ever come remotely near the amount given by those calculations.

Regards,

Joe White

Environmental Lab Support Technician

Emission Unit ID	VOC in coating	lbs/hour	hours/year	lbs VOC/year	Tons VOC/year
SP1			Permitted		
SP2			Permitted		
SP3			Permitted		
SP4	8.89%	170	8760	132389.88	66.19494
SP5	8.89%	310	8760	241416.84	120.70842
SP6	8.89%	310	8760	241416.84	120.70842
ProdTopStar			Permitted		
ProdJumboStar			Permitted		
ProdMegaStar			Permitted		
NatalleRC1	12.61%	76.8	8760	8483.60448	4.24180224
NatalleRC2	12.61%	76.8	8760	8483.60448	4.24180224
PDMegaStar	12.61%	95	8760	10494.042	5.247021
PDStarPrint	4.84%	5	8760	2119.92	1.05996
			Unpermitted		322.4023655
			Permitted		67
					<b>389.4023655 Total Tons</b>