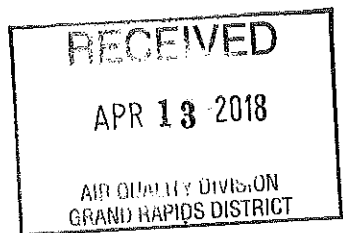


Plant



13 McConnell St. SW, Grand Rapids, MI 49503
 P: 616.451.4599 | specind.com

April 13, 2018



Ms. April Lazzaro
 Senior Environmental Quality Analyst
 Grand Rapids District Office
 MDEQ-Air Quality Division
 350 Ottawa Avenue, NW – Unit 10
 Grand Rapids, MI 49503-2341

Re: Response to Violation Notice
 Spectrum Decorative Finishes (SRN No. N6218)

Dear Ms. Lazzaro:

This letter is in response to your Violation Notice (VN) dated March 26, 2018. The VN alleges that the Spectrum Decorative Finishes (Spectrum) facility located on McConnell Street in Grand Rapids, Michigan, had the compliance issues summarized in the table below. Spectrum's response to each item and the information requested in the VN are provided below.

Item No.	Process Description	Rule/Permit Condition Violated	Comments
1	EUBASECOAT	Rule 910	Failure to properly install, maintain, and operate an air- cleaning device.
2	EUMAINLINE	PTI No. 277-97C, EUMAINLINE, Special Condition IV.3 Rule 910	The company operated EUMAINLINE without the RTO on November 20, 2017.
3	EUMAINLINE & FGFACILITY	PTI No. 277-97C, EUMAINLINE, Special Condition V.1	Failure to utilize Method 24 to determine VOC content, water content, and density of any material as applied and as received.

Item No. 1

Spectrum engineers have been working to design and install a dry filtration system for EUBASECOAT to replace the wet system. The replacement of the current wet system is exempt from permitting requirements pursuant to Rule 287(f) and EUBASECOAT will continue to be exempt from permitting requirements pursuant to Rule 287 following the upgrade in the particulate control system. Spectrum anticipates that the dry filtration system for EUBASECOAT will be installed by the end of May.



13 McConnell St. SW, Grand Rapids, MI 49503
P: 616.451.4599 | specind.com

Item No. 2

On November 20, 2017, Spectrum had an RTO malfunction that started at approximately 10:00 am. Spectrum continued to operate while maintenance personnel investigated the problem. Once it was determined that Spectrum did not have the parts on hand to fix the problem with the RTO, personnel stopped loading parts onto EUMAINLINE. The process continued to run until all parts that were already in the system were finished. Although the RTO remained at elevated temperatures, Spectrum calculated emissions during the time of the malfunction assuming zero percent control efficiency. Emissions for this period were compliant with all permit conditions and daily average VOC contents for coatings used remained below Rule 632 emission limits that would apply without the RTO.

Rule 912 states: "A source, process, or process equipment that complies with all applicable emission standards and limitations during periods of abnormal conditions, start-up, shutdown, and malfunction shall be presumed to have been operated in a manner consistent with good air pollution control practices for minimizing emissions." Therefore, the cited item does not constitute a violation, as emissions from EUMAINLINE complied with all applicable emission standards and limitations during the malfunction.

Item No. 3

Spectrum believed that the MDEQ had agreed to allow use of manufacturer's data in lieu of Method 24 testing, as the MDEQ has historically compared manufacturer's data to the recordkeeping in previous inspections. However, after reviewing our files, we could not locate an official request or approval. Because Spectrum uses over 50 different materials on EUMAINLINE alone, we request that the MDEQ allow use of manufacturer's data in lieu of Method 24 testing for both EUMAINLINE and FGFACILITY.

Spectrum has received quotes for the capture and destruction efficiency testing and is in the process of selecting a firm. If you have any questions or require additional information, please contact me at 616.717.5947 or cadams@specind.com.

Sincerely,

A handwritten signature in cursive script that reads "Charlie Adams".

Charlie Adams
Plant Engineer

By email

cc/att: Ms. Susan Kuieck, PE – Fishbeck, Thompson, Carr & Huber, Inc.