



October 17, 2022 – Revised October 31, 2022

Ms. Jenine Camilleri (CamilleriJ@michigan.gov)
Department of Environment, Great Lakes, and Energy (EGLE)
Air Quality Division (AQD)
Warren District
27700 Donald Court
Warren, Michigan 48092

RE: Notice of Violation; Twenty-One Day Response; PTI #79-03C
SRN: N7164, Macomb County
Qualawash Holdings, LLC, IBC Cleaning Facility, 50321 Russell Schmidt Drive, Chesterfield, MI
(the "Facility")

Dear Ms. Camilleri:

Quala Services, LLC ("Quala") submits this Twenty-One Day Response and provides the information required by the Notice of Violation ("NOV") of September 26, 2022. This letter complies with the requirement of the NOV "...within twenty one (21) days of receipt of this Notice of Violation, a written report that includes the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence...."

A semi-continuous container cleaning process, excluding EULINEHEELING:

- 1) *FGPROCESSLINE SC V.1: "ADQ has not received a test plan nor test report, required in FGPROCESSLINE SC V.1, indicating Quala has not yet conducted testing to verify the butyl cellosolve emission factor from FG-PROCESSLINE. The conditions of PTI number 79-03C (FGPROCESS LINE SC V.1) require Quala to Within two years after issuance of PTI 79-03C, the permittee shall verify the butyl cellosolve (CAS# 111-76-2) emission factor from FGPROCESSLINE (excluding EULINEHEELING) by testing at the owner's expense, in accordance with Department requirements. Testing shall be performed using an approved EPA Method listed in 40 CFR Part 60, Appendix A."*

Response: Quala has an outside consultant to assist with completion of this condition. An extension was going to be requested since there is not a clear-cut way to complete this condition but due to miscommunication, the extension was not filed. After further reviewing this condition of the permit, Quala believes the best route for compliance is to look for an approved alternative method of measurement. The current requirement for emissions testing as outlined in the permit would include testing from a stack at which the facility doesn't currently have present for any of the processes. Quala plans to complete a permit application to look to change several conditions in the permit. This condition being one of those. Additional data is in the process of being collected from the pit waste stream to determine the actual amount of butyl cellosolve and butyl acetate in the waste stream. Collecting this data will allow the facility to perform a mass balance for the facility calculations versus using a theoretical emission factor. The permit application is planned to be submitted by December 30, 2022.

A container cleaning process line where used totes containing paint

- 1) FGOFFLINE SC III.4. *"...Quala reported the hourly average totes processed at FGOFFLINE on April 19, 2022 was four. This has exceeded three totes per hour limit based on a daily average. The conditions of PTI number 79-03C (FGOFFLINE SC III.4) requires Quala not to process more than 3 totes per hour based on a daily average, nor 4,000 totes per 12-month rolling time period as determined at the end of each calendar month."*

Response: Typical operations for this section of the facility doesn't normally reach production levels where this limit is exceeded. Day prior to and the day after April 19, 2022, indicate the facility was well below the 3-tote requirement (1 tote per hour). Also, this is one day of the 365 days which the requirement was exceeded. The 12-month rolling time period tote count was well below the 4,000-tote requirement (2,160 totes) at the time of occurrence. Training with facility management and employees have been completed to ensure compliance.

Process Line Rinse and Cleaning

- 1) Rule 202. *"...On June 8, 2022, July 6, 2022, and August 26, 2022, AQD notified Quala to correct the reported VOC emissions for Process Line Rinse and Cleaning for RGPROCESSLINE and resubmit the RY 2021 MAERS report. Quala has not resubmitted the RY 2021 MAERS report as of September 20, 2022."*

Response: InforMAERS representative was contacted to obtain access to the online system for new Quala employee to complete task. RY 2021 MAERS report was resubmitted on October 10, 2022.

A semi-continuous container cleaning process line where used totes containing paint

- 1) FGPROCESSLINE SC I.1 *"...Records provided show the VOC emission limit in FGPROCESSLINE SC I.1 was exceeded in the 12-month periods ending July 2021, August 2021, September 2021, October 2021, November 2021, December 2021, January 2022, February 2022, March 2022, April 2022, and May 2022. The conditions of PTI number 79-03C*

(FGPROCESSLINE SC I.1) require Quala VOC emissions limit to 42.62 tpy for a 12-month rolling time period as determined at the end of each calendar month.”

Response: The reason for high amounts of VOC emissions was additional amounts of butyl cellosolve was used due to the difficulty cleaning customer totes during last 3 months of the later part of the July 2020 to June 2021 12-month rolling period. Facility has made a concentrated effort in reducing the amount of butyl cellosolve being used in the facility by using increased amounts of caustic and water solution for the initial cleaning of each tote. It was also felt the facility would be at or below the FGPROCESSLINE emissions limit earlier in 2022 but after discussions with Kerry Kelly, Senior Environmental Quality Analyst, it was noted the calculations were partially mis-calculated. Those calculations have been corrected. Overall, the facility has experienced an approximate 57% decrease in VOC emissions since July 2021 due to the decreased usage amount of butyl cellosolve. June and July 2022 12-month rolling emissions are below the 42.62 tpy VOC emissions requirement (39.762 tpy and 41.14 tpy respectively). The plans of reduced butyl cellosolve usage continue and VOC emissions will be closely monitored for compliance.

A container cleaning process line where used totes containing paint

- 1) FGPROCESSLINE SC III.3b and c “...A level sensor was not installed on the heel waste trough and a vapor control valve was not installed on the heel waste tote. The conditions of PTI number 79-03C (FGPROCESSLINE SC III.3) require Quala b) Installing and maintaining a level sensor on the heel waste collection system to ensure only liquid waste is being pumped from the storage trough into the storage tank. c) Installing and maintaining a properly operating control valve on the heel waste storage tank to minimize the venting of fugitive emissions”

Response: The facility worked through attempting to engineer a design that would work to perform the task and meet the condition of the permit but was not successful due to it was not sustainable from a maintenance feasibility standpoint. Facility redesigned process for heel waste to gravity feed to a storage tank (tote) eliminating the need of a level sensor and pump. Pictures and description of the modified process was sent to Kerry Kelly, Senior Environmental Quality Analyst and has been reviewed. Quala will submit a permit application to request removal of this condition in the permit. This permit application will be submitted by December 30, 2022.

All Process Equipment Including Equipment Covered by other Permits, Grand-Fathered Equipment, and Exempt Equipment:

- 1) FGFACILITY SC I.3 ...Records provided show the VOC emission limit in FGFACILITY SC I.3 was exceeded in the 12-month periods ending July 2021, August 2021, September 2021, October 2021, November 2021, December 2021, and January 2022. The conditions of PTI number 79-03C (FGFACILITY SC I.3) require Quala to be less than 80.0 tpy for VOC emissions for a 12-month rolling time period as determined at the end of each calendar month.



Response: The reason for high amounts of VOC emissions was additional amounts of butyl cellosolve was used due to the difficulty cleaning customer totes during last 3 months of the later part of the July 2020 to June 2021 12-month rolling period. As discussed in a previous response, the facility has made a concentrated effort in reducing the amount of butyl cellosolve being used in the facility by using increased amounts of caustic and water solution for the initial cleaning of each tote. The facility has experienced an approximate 29% decrease in VOC emissions since July 2021 in the FGFACILITY due to the decreased butyl cellosolve usage. Total emissions have been below the 80 tpy requirement since February 2022. The plans of reduced butyl cellosolve usage continue and VOC emissions will be closely monitored for compliance.

Should you have any questions or comments, please do not hesitate to contact me by telephone at (419) 769-9144 or by email at bkauser@quala.us.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "B. Kauser", with a long horizontal flourish extending to the right.

Brett Kauser
EHS Specialist