



January 13, 2017

Mr. Matt Deskins
Environmental Quality Analyst
Air Quality Division

Reg: Violation notice for SRN: N7486, dated Dec 9, 2016



Dear Mr. Deskins,

It is always pleasure working with you and we appreciate very much for all your time and help with compliance matters. This letter is in response to the violation notice, dated Dec 9, 2016. Below is a synopsis of the cause of the violation you noticed, the response and further action that was taken.

Explanation for Comment 1-5: Please see attached manually calculated VOC report and the supply gallons by the coating line for the requested 12 month rolling period 12/01/2015 through 11/30/2016. The “automated report” you received from my colleague for this period was generated using “Dyna Tools” software for recording the paint usage and to print various reports for compliance record keeping. This software has capabilities to print any time period reports. I believe in the first quarter of 2016, there was an update installed to the software, which could have caused VOC miscalculations. I normally double check automated report with my manual calculations but my colleagues overlooked the automated report. We apologize for submitting an inaccurate report and we trained more team members to prevent this from reoccurrence.

As per actual calculations, we are well below our permitted levels on VOC’s. For Coating Line 1, emissions are 16,376.53 lbs and for Coating Line 2, they are 13,151.60 lbs. Please see attached calculations for your info. If you need more clarifications, please let me know.

We reached out to our “Dyna Tools” software vendor to address this internal “bug” to address this inaccurate report printing. They are working on the fix but until then we must rely on manual VOC calculations done in Microsoft Excel file using formulas. Using this file, we could still calculate VOC’s for any time period within few minutes of a request. Once this bug is fixed, we will submit another report for the same period for validation.

Explanation for Comment 6: We have examined the blast operation for emitting dust and found out that our employee was operating the equipment/room without filtration media in our exhaust plenum on 12/02/2016. After the maintenance on the equipment and the room on 11/30/16, maintenance crew forgot to replace the filters with new ones. The operator did not notice the filters not being in place and started operating the room. After this incident, we trained our employees and created an inspection checklist to check items before the operation to prevent this from happening again.

We appreciate very much for bringing these issues to our attention and Thank you very much for your assistance with this matter. If you need any other details, please feel free to contact me through an email or phone.

Sincerely,

A handwritten signature in black ink, appearing to read "Siva", with a long horizontal flourish extending to the right.

Siva P Masetty
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