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September 18, 2020

Mr. Matt Deskins
Environmental Quality Analyst
Air Quality Division

Reg: Violation notice for SRN: P0491, Dated Aug 25, 2020

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, Aug 25, 2020. Below is a synopsis of the cause of the violation you noticed, the response and further action that was taken.

Explanation for Comment 1: We use a program called "Dyna Tools" to keep track of our paint usage everyday but this does not calculate VOC emissions. We have spoken to this program vendor, but they said they cannot integrate VOC calculations. Because of this limitation, we calculate these emissions using Excel program put together internally. This Excel program gives us the results as soon as we enter the paint data. It was misunderstanding on our part with the Rule Special Conditions I.1, I.2, VI.1.d, and VI.1.e of General PTI No. 2-14 that we are meeting this rule by having 2 different programs to calculate emissions but not from one program. Because of our data software limitation, we have trained our team to calculate Emissions and keep record of them to meet this rule. We are actively looking for any other program that is out there which could give us instantaneous VOC Emissions Records for any time period.

Explanation for Comment 2: We apologize for leaving 5-gallon paint buckets with paint waste/spent purge solvent uncovered in the paint booth. Our supervisor and his team are making sure this does not happen again. They are covering them as soon as they purge paint from paint lines. Also, this is part of their daily end of the day checklist.

Explanation for Comment 3: Because of our limitation with our paint data program there was a delay in calculating the emissions, but we are actively looking into another program which could give us instantaneous results. Until then our team will maintain records of these results using both programs (Dyna Tools and Microsoft Excel). We are working on updating our current permit from 10 ton per year to 60 ton per year to address exceeding our VOC permit limit. We have reached out to outside professional help to help us with this process. Because of this year's unprecedented times, we will not be exceeding our permit limits for 2020 but we are planning to apply for 60 ton per year permit by November 30th, 2020 to be ready for 2021.

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

Sincerely,

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