

V MACES

PO636



1319 S. Elm Street
 Jackson, Michigan 49203
 (517) 782-8161 FAX (517) 782-7758



September 14, 2015

Mr. Michael M. Gabor
 Environmental Quality Analyst
 Air Quality Division
 Michigan Department of Environmental Quality
 Jackson District Office
 301 East Louis Glick Highway
 Jackson, MI 49201-1556

Subject: Violation Notice, Elm Plating Co., 533 Hupp Street, Jackson, MI

Dear Mr. Gabor,

In response to your Violation Notice dated August 24, 2015, to Mr. Chuck Mohlman at Elm Plating Co. at 533 Hupp Street, Jackson, Michigan, we respond as follows:

1. Dates Violation Occurred: Our records indicate that the paint usage volumes exceeded the exemption level in R336.1287(c) beginning in October, 2014;
2. Causes of the Violation: Management was not familiar with the regulatory requirements for Registration and compliance with the exemption terms including the response needed when the exemption limits were exceeded;
3. Duration of Violation: Paint usage has exceeded the quantity specified in the R336.1287(c)(i) for each month since October, 2014;
4. Whether the Violation is ongoing: The Violation is ongoing;
5. Summary of Actions that have been taken and are proposed to be taken and dates by which these actions will take place:
 - a. Assign responsibility to maintain tracking of paint usage: September 1, 2015 (completed)



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- b. Delegate responsibility to obtain training on Permit Application requirements: September 1, 2015 (completed)
 - c. Complete and submit Permit to Install Application: October 1, 2015
 - d. Select Engineering Design Consultant, develop capture system, and specifications for Emission Control System: January 1, 2016
 - e. Complete selection of Contractors to construct and install capture and control system, award Contracts: March 14, 2016
 - f. Complete construction and installation of capture and control system: August 1, 2016
 - g. Complete start up and begin ongoing operation of controls: September 1, 2016
6. Steps taken to prevent recurrence: Compliance with the Michigan Administrative Rules for Registration and obtaining a Permit under R336.1201 has been added to our Compliance Evaluation Requirements that is audited by a qualified external Consultant.
7. Facility-wide Potential to Emit calculations for criteria pollutants and Hazardous Air Pollutants: See attached.

Elm Plating Co. will provide notifications to you as each of the above Actions are completed. We have already contacted potential suppliers of Thermal Oxidizers to determine what units may be available to purchase to reduce the schedule and achieve compliance at an earlier date. Please contact me at (517) 782-8161 or Jonas.mccluskey@elmplating.com if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonas McCluskey", written over a horizontal line.

Jonas McCluskey
Chief Operating Officer

Elm Plating Co. Plant 3
Facility Wide Potential to Emit Summary

Emission Unit	Basis		VOC (Tons/Month)		CO (Tons/Month)		NOX (Tons/Month)		SOX (Tons/Month)		PM		HAPs (Pounds/Month)		
			Uncontrolled	Controlled	Uncontrolled	Controlled	Uncontrolled	Controlled	Uncontrolled	Controlled	Uncontrolled	Controlled	Identity	Uncontrolled	Controlled
Coating Line 1	900 gallons/month	7 lb VOC/Gal	3.15	0.76*	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100-41-4	31.5	7.6
													91-20-3	31.5	7.6
													67-56-1	31.5	7.6
Oven 1 Preheat	1,500,000 BTU/Hr	AP-42 Table 1.4-2.	0.035		0.541		0.644		0.0039		0.049				
Oven 1 Cure	2,500,000 BTU/Hr	AP-42 Table 1.4-2.	0.058		0.902		1.07		0.0064		0.082				
Coating Line 2	500 gallons/month	7 lb VOC/Gal	1.75	0.42*									100-41-4	17.5	4.2
													91-20-3	17.5	4.2
													67-56-1	17.5	4.2
Oven 2	3,000,000 BTU/Hr	AP-42 Table 1.4-2.	0.071		1.08		1.28		0.0078		0.098				
Part Shot Blaster	780 cfm	99.99% Control									1.54	0.0002			
Process Heater	300,000 BTU/Hr	DEQ Worksheet	0.0071		0.108		0.013		0.0008		0.0098				
Table Blaster	780 cfm	99.9% Control									1.54	0.0015			
Furnace (Office)	88,000 BTU/Hr	DEQ Worksheet	0.002		0.0076		0.0378		0.0002		0.0033				
Space Heater 1	175,000 BTU/Hr	DEQ Worksheet	0.011		0.041		0.204		0.0012		0.018				
Space Heater 2	175,000 BTU/Hr														
Space Heater 3	125,000 BTU/Hr														

* after installation of Control