



Department of Environmental Quality

June 12, 2017

Air Quality Division

Re: Response to Violation Notice May 10, 2017
SRN/ID P0687

Nazaret Sandoval,

On March 22, 2017 you conducted an on-site inspection of the Advance Engineering (AE) Canton MI. facility. During your inspection you found Advance Engineering was found to be in Non-Compliance and have issued a Violation Notice per out PTI No. 64-16 conditions.

- 1) PTI No.64-16 Special Conditions (SC) VI.1, VI.2.d, VI.2.e
- 2) VOC Emission calculations determining the annual emission rate of each in tons per 12 month rolling time period as determined at the end of each calendar month using the mass balance or an alternate method acceptable to the AQD District Supervisor. For the first month following permit issuance, the calculations shall include the summation of emissions from the 11 month period immediately preceding the issuance date. For each month thereafter, calculations shall include summation of emissions for the appropriate number of months prior to permit issuance plus the months following permit issuance for a total of 12 consecutive months.

Corrective measures applied by Advance Engineering:

This Condition has existed since issuance of the PTI dated May 13, 2016.

AE had previously documented on a spreadsheet the movements of the 142 Flash Solvent utilized. The information is gathered each week to prepare for annual reporting. Advance Engineering did not have a calculations summary to calculate VOC Emissions as required per the permit at the time of the Inspection.

AE has since added a spreadsheet to track and calculate VOC Emissions per the permit guidelines, in a manner suitable to the DEQ AQD, on a rolling 12 month format to define and accurately track and report VOC Emissions and have readily available for review by AQD.

Please review attached documentation as evidence as such.

AE does not utilize within it facilities any products that contain any HAPs. Therefor there are no HAPs to report or track.

As our workforce stabilizes in our new Canton facility, we expect our new staff will become accustomed with the requirements of the job as well as expect the many underlying issues that have not been discovered yet to be corrected.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Kenger', with a long horizontal flourish extending to the right.

Rich Kenger

EHS & Training Manager

Advance Engineering Co.

7505 Baron Dr.

Canton MI 48187

MONTH AND YEAR	Solvent Purchased (Gallons)	Solvent Reclaimed (Gallons)	NET Solvent Used (Gallons)	Net Solvent Used 12-month rolling (Gallons) Limit = 11,940 gal/yr	Monthly Solvent Used (Pounds)	Monthly VOC Emission= Solvent Used (TON)	VOC emissions 12-month rolling (TPY) Limit = 40 TPY	Net Solvent Used Year Total (Gallons)	VOC emissions Year Total (TON)
January-16			275		1842	0.92			
February-16			825		5525	2.76			
March-16			0		0	0.00			
April-16			275		1842	0.92			
May-16			1100		7367	3.68			
June-16			0		0	0.00			
July-16			495		3315	1.66			
August-16			495		3315	1.66			
September-16			0		0	0.00			
October-16			2970		19890	9.95			
November-16			495		3315	1.66			
December-16			495	7425	3315	1.66	24.86		
								7425	25
January-17	990	1,750	(760)	(5,420)	(5,090)	(3)	(18)		
February-17	495	2,500	(2,005)	(4,660)	(13,427)	(7)	(16)		
March-17	495	1,800	(1,305)	(2,655)	(8,740)	(4)	(9)		
April-17	1,100	950	150	(1,350)	1,005	1	(5)		
May-17	0	1,500	(1,500)	(1,500)	(10,046)	(5)	(5)		
June-17			0	0	0	0	0		
July-17			0	0	0	0	0		
August-17			0	0	0	0	0		
September-17			0	0	0	0	0		
October-17			0	0	0	0	0		
November-17			0	0	0	0	0		
December-17			0	0	0	0	0		
								(5,420)	(18)