



DEQ Letter dated 12/7/18

www.CentralConveyor.com
Office: 248.446.0118

Friday, December 21, 2018

DEQ, AGD, Southeast Michigan District
27700 Donald Ct.
Warren, MI 48092-2793

Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division

RE: Central Conveyor
52800 Pontiac Trail
Wixom, MI 48293

Dear Mr. Konanahalli,

Central Conveyor Company received your letter dated December 7, 2018 and offer the following responses. In late October 2018 Central Conveyor hired an independent company (US Compliance Corporation) to perform an environmental compliance audit of our facility at 52800 Pontiac Trail Wixom, MI. The results of this audit were received on November 8, 2018, which indicated we needed a Permit-to-Install based on system capacity and we immediately initiated our first discussions with DEQ representatives Jenifer Dixon and David Thompson to begin the process of obtaining a Permit-to-Install for our existing paint booth.

As referenced in your letter, our first violation, Rule 336.1201 "installed the paint spray booth without obtaining a Permit-to-Install". Central Conveyor was unaware of such permit and was understanding all permits were obtained by the installation company when the paint booth was purchased and installed. See attached permit from Charter Township of Milford. Central Conveyor is currently working with the DEQ AQD office to submit the application for the Permit-to-Install. We have completed our internal audit of paint purchases for this year and have submitted this information to Jenifer who is assisting us in calculating our VOC/HAP usage; unfortunately, we are at the beginning of the holiday season and Jenifer is on vacation. We expect to finalize these values on her return and will formally submit for our permit by January 15, 2019.

The second violation, Rule 336.1910 "back-draft dry filter system for paint overspray capture was inadequate. The filters were not installed properly; there were numerous holes and gaps". On December 11, 2018 Central completed a cleanup and preventative maintenance on the paint booth. This included replacing all bag and media filters, filling all gaps and overall general cleanup of equipment. Below are photos of the paint booth after completion. In addition, Central held a training course for all employees that work in this area to ensure all tasks are properly done to avoid paint particulate laden air from bypassing the filter media. See attachment.

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Licenses: Alabama 41956, Louisiana 35404, Mississippi 17371-S, South Carolina G113790 and Tennessee 00041891
52800 W. Pontiac Trail, Wixom, MI 48393-1928 | Fax 248.446.1550 • 1016 Powder Plant Road Bessemer, AL 35022 | 205.989.6630 | Fax 205.989.6636



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In closing, Central Conveyor is committed to our environment and community and will be sure all regulations are in compliance. This is why we took the initiative to hire a 3rd party to audit our company. We kindly request leniency for these violations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Estes', is written over a white background.

Kevin Estes
Chief Operating Officer
Central Conveyor Company

CC: Ms. Jenine Camilleri, Enforcement Unit Supervisor
DEQ, AQD PO Box 30260, Lansing MI 48909-7760

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