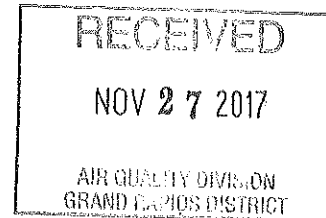


November 22, 2017

Mr. Tyler Salamasick  
Environmental Quality Analyst  
Michigan Department of Environmental Quality  
Air Quality Division – Grand Rapids  
350 Ottawa Avenue NW; Unit 10  
Grand Rapids, MI 49503



**Re: Response to Violation Notice Dated October 13, 2017 for the Van Dellen Steel, Inc. Facility in Dutton, Michigan (SRN: U411707382)**

Dear Mr. Salamasick:

On October 13, 2017, the Michigan Department of Environmental Quality, Air Quality Division (AQD) issued a Violation Notice (VN) to Van Dellen Steel, Inc. (Van Dellen) alleging the following violation of Michigan's Administrative Rules for Air Pollution Control (PA 451 of 1994, as amended) at its facility located in Dutton:

Process Description	Rule/Permit Condition Violated	Comments
Metal Coating	Rule 201	Failure to obtain a permit to install. The facility does not meet the Rule 287(2)(c) permit exemption due to the amount of coating used. Facility did not demonstrate records that would show compliance through Rule 290(2) permit exemption.

The VN further states that a program for compliance may include a completed permit to install (PTI) application for the spray coating equipment at both Van Dellen and Specialty Metal Fabricators. This submittal constitutes the written response to the alleged violation.

### **Program for Compliance**

Van Dellen is working with its suppliers to assess the viability of reformulating one or more coatings to a lower volatile organic compound (VOC) content. Should this be a viable option, the facility would conduct coating operations in compliance with applicable PTI exemption criteria promulgated under Rule 290. Records demonstrating compliance with the Rule 290 exemption would be maintained in accordance with the rule.

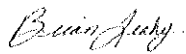
If reformulation is not possible, Van Dellen will instead submit an administratively complete PTI application covering any non-exempt coating operations at the facility. The application package will

contain all information required under Rule 203, including a description of each emission unit covered by the application, a description of applicable federal and state air pollution control regulations, an estimate of regulated new source review (NSR) pollutants and toxic air contaminants (TACs), a demonstration of compliance with control technology and air quality impact requirements, to the extent applicable, and an identification of emission units exempt from the PTI requirement pursuant to Rules 278 to 291. Historical records indicate that coating operations under the ownership and operational control of Specialty Metal Fabricators meet Rule 287(2)(b) and Rule 287(2)(c) exemption criteria.

Van Dellen has retained Barr Engineering Co. (Barr) to provide relevant regulatory and technical support, and, should reformulation not be a viable option, to assist with the preparation of an administratively complete PTI application package for non-exempt surface coating operations. Submittal of a PTI application package to the AQD would occur no later than December 30, 2017.

Please do not hesitate to contact me at (616) 512-7018 or [bleahy@barr.com](mailto:bleahy@barr.com) if you have any questions or require additional information.

Sincerely,



Brian E. Leahy  
Senior Meteorologist

cc: Corey Van Dellen, Van Dellen Steel  
Alan Schwartz, Miller Johnson