



State of Environment, Great Lakes, and Energy

301 East Louis Glick Highway

Jackson, Mi 49201

Attention: Mike Kovalchick

The purpose of this letter is to provide an update on DAPCO Industries progress on correcting the violations discovered during evaluation of DAPCO'S last four years of data reporting. After working with our consultant, we investigated and converted our records into the correct rolling monthly average format. It was discovered that there were 7 separate instances where the 12-month rolling total emission rate exceeded the air permit limit. Below are dates and explanations of the violations:

1. August 2019 9.6 Tons Lack of precision reporting when adding Methylene Chloride
2. February 2020 9.9 Tons Excessive production hours
3. March 2020 9.9 Tons Excessive production hours
4. January 2022 9.6 Tons Lack of precision reporting when adding Methylene Chloride
5. August 2022 9.6 Tons Lack of precision reporting when adding Methylene Chloride
6. September 2022 9.6 Tons Excessive production hours
7. October 2022 9.9 Tons Excessive production hours

DAPCO tracks methylene chloride usage by the month and by the full barrel. The department's supervisor reports a barrel after it becomes completely emptied in the month the last bit of the barrel has been used. This method of collecting data has potential for skewing (reporting more usage than actual) the Rolling 12 Month total.

**Action Items:**

Based on the recommendation from EGLE, and working with our consultant, we will be applying for an opt-out permit and limit our hours of use. This permit will be completed and submitted within the next few weeks.

Internally we have implemented and will be implementing new data reporting methods and policy's as well as adding tools to improve accuracy in measuring methylene chloride being put into the machine. We will be measuring methylene chloride usage by the gallon instead of whole barrel being added. This will provide a more precise data report.

We have already implemented a company policy requiring approval from the environmental manager before methylene chloride is added to the degreaser. This will prevent an overuse event. Authorization will be given by verifying the methylene chloride add does not violate the Rolling 12 Month requirement. New reporting methods are also being implemented to ensure that the rolling average is being tracked and monitored.

Lastly, after working with the manufacturing of our degreaser who also works closely with federal and state environmental regulations, we have been informed that our particular degreaser design is a self-contained unit and a lid is not required. According to his report, "Under 40CFR Part 63 Subpart T, paragraph 63.463 (a)(1) allows for an option (i) a cover OR (ii) an enclosed design. In this case the equipment meets the definition of an enclosed design degreaser."

Please feel free to contact me if you have any other questions.

Michelle Byrnes,  
Material Manager