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AtlasEPS.com

May 24, 2018

Ms. Heidi G. Hollenbach, District Supervisor
Michigan Department of Environmental Quality
Grand Rapids District Office
State Office Building, 5th Floor
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341



RE: Violation Notice Response - Atlas EPS, a Division of Atlas Roofing Corporation,
Byron Center, MI

Dear Ms. Hollenbach:

The purpose of this letter is to respond for the violation notice that we received on May 4, 2018 for the Atlas EPS facility located at 8240 Byron Center Avenue in Byron Center, Michigan, operating under Michigan Renewable Operating Permit (ROP) Number MI-ROP-N1794-2012 and MI-ROP - N1794-2017.

The first notice was for five instances noted of the facility exceeding its daily allowance. All were attributed to either missing data for time worked on a weekend day or for work that was entered manually on an incorrect day due to a system failure. Below is an explanation for each instance and attached is our support for each instance.

12.3.2016 - This day was a Saturday that was worked but our spreadsheets were not setup to pick up the Saturday hours. When we updated the hours worked during that day, our hourly output was 30.47 Timesheets attached for support.

12.17.2016 - This was another incidence of the same type that a Saturday was worked but the hours were not correctly stated in our reporting. Corrected data changes the output per hour to 123.12

12.24.2016 - The data on the original sheets that you have showed work on 12.24, 12.25, & 12.26. The company was shut down for those 3 days and the expansion batches associated with those amount were actually done on 12.27, 12.28 & 12.29 Hours and expansion lbs updated to correct dates.

7.9.2017 - This again was another instance of us not correctly picking up the times for weekend work. We had a power outage on July 7th and stopped production around 2pm.

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Production started again around 7am on July 8th and we ran for both July 8th and 9th to catch up. I have noted the hours worked for those days

1.21.2018 - The expansion batches noted for this day in our records were not correct due to system failure the prior Friday. One of our operators manually entered the batches in the system all showing started at 11pm on 1.21.18, but all but 2 of these batches were from 1.20.18 Saturday. Documents attached showing the original date of the batches being run, even though our system showed them started and run on 1.21

We have implemented new practices based on this audit to catch errors associated with hours worked and manual inputs of data. We are working on creating a report to show actual hours worked during a day to more accurately report but will be doing it manually until the report is created. We have updated the work instructions for material that are entered manually to show the time and date of when the batches were actually run.

The second notice was missing documentation related to the annual certification report for the period of January 1, 2017 through January 23, 2017 under MI-ROP-N1794-2012, which was submitted with all other documents on January 24, 2018. I have attached a copy of the original for your files.

We are asking to have the violations removed as all of the instances noted were not related to us exceeding our output limits but due to data errors submitted for review.

If you should have any questions or require additional information, please contact me at (616) 583-1380. Thank you for your assistance.

Sincerely,
Atlas EPS, a Division of Atlas Roofing Corporation



Robert Butkus
Plant Manager

Attachments – Forms 5737