

September 29, 2020

Ben Witkopp, Environmental Engineer  
Air Quality Division  
Department of Environment, Great Lakes and Energy  
Bay City District Office  
401 Ketchum Street, Suite B  
Bay City, MI 48708

Re: Plastic Trim International (Minth Group)  
935 N. Aulerich Rd.  
East Tawas, MI 48730  
State Registration No. N3592  
Response to Notice of Violation

Dear Mr. Witkopp:

Plastic Trim International, Inc. received a Violation Notice (VN) letter dated September 10, 2020 from your office. This notice identified one rule violation of improper stack heights of the passive ventilation of oven/cool down area is not 1.5 times the building height, as required by the General Coating Permit #305-02, Condition VIII 1. (There was also a paint odor present that could be smelled). These violations were discovered during an EGLE visit on September 10th, 2020.

PTI understands that the stack height condition is required in order to meet the prerequisites of the General Coating Permit. Due to the proximity of the plant to the Iosco County Airport, PTI is unable to raise the stack to the proper height to satisfy the permit condition. When PTI applied for the General Coating Permit, we were unaware of the stack height limitation imposed by the airport.

Even though the stack heights were below the minimum requirements for the General Coating Permit, PTI believes the stack heights created no adverse air pollution impacts. PTI operates a state-of-the-art paint line and uses a regenerative thermal oxidizer (RTO) to control VOC emissions. The organic emission destruction efficiency of the RTO is estimated to be at least 95%.

Because PTI is unable to increase the stack heights, the stack height violations are ongoing. In order to correct these issues, PTI proposes to prepare an application for a new site-specific

Permit to Install (PTI) that will incorporate permit conditions for the existing stack parameters. This is being done for a previous finding by your office. The permit application was mailed out yesterday.

Also Minth has contacted the original designer and builder of our paint line, Eisenmann, to design and connect the Oven ventilation to the RTO, we believe this will eliminate the odor as well.

If there are any questions or additional information needed, please do not hesitate to contact me at (989) 362-4419 extension 2517, or [jerry.fitch@minthgroup.com](mailto:jerry.fitch@minthgroup.com).

Sincerely,  
Sincerely,



Jerry Fitch  
El-IS Supervisor