Warner Norcross + Judd LLP

June 4, 2021

(via email)

Samantha Davis
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division - Lansing District
525 West Allegan Street
P. O. Box 30242
Lansing, Michigan 48909

Re: **Centurion Supplement to Response to Violation Notice**

Dear Ms. Davis:

On behalf of our client, Centurion Medical Products ("Centurion"), we are providing a supplement to Centurion's May 12 response to the Michigan Department of Environment, Great Lakes, and Energy ("EGLE") Air Quality Division's ("AQD") Violation Notice ("VN") dated April 22, 2021. While Centurion continues to dispute the VN, the company has made augmentations and proposes additional improvements that we believe address EGLE's stated goals.

When combined, these actions will enhance Centurion's existing controls, which are in compliance with our permit, and create a sterilization process with permanent total enclosure (PTE) under negative pressure that will ensure all air within the facility is routed through existing abatement systems.

Actions Completed

1. As a result of NFPA 55 safety code, the chamber room has a floor sweep vent. Centurion conducted a safety review and determined this vent could be closed and capped. Extended backvent periods will take place as needed, which go to existing abatement technology.
2. Makeup air was turned off in the staging area to create more negative pressure.

Actions in Progress

1. Curtain or close doors to product staging to reduce non-draft openings (NDOs).
2. Install pressure differential monitoring systems on entry points of staging area.
3. Contain all sterilized product in the staging area before ready to ship.
4. Close and seal any wall or ceiling openings.

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Verification

Centurion proposes to validate permanent total enclosure with a third party company once all items are completed, which includes meeting items 2 through 5 of EPA Method 204. As the abatement controls are currently in compliance with the existing permit, verification of the PTE will demonstrate both the effectiveness of the augmentations as well as provide third-party validation of the improvements.

Furthermore, Centurion proposes conducting a fugitive emissions study in the operating area of the facility to understand the potential to emit based on concentration and airflow. A sampling plan will be provided to EGLE for approval prior to completion.

None of these items require any permit modification as they do not constitute a modification of a "process" or "process equipment" as defined by Rule 201. Centurion is available to provide any additional information regarding the aforementioned items and welcomes feedback or additional suggestions from EGLE.

Very truly yours,

John V. Byl

dmt

c: Jenine Camilleri *(via email)*
Jasper Titus, Centurion Medical Products *(via email)*
Mary Ann Dolehanty, EGLE *(via email)*
Dr. Eduardo Olaguer, EGLE *(via email)*
Christopher Ethridge, EGLE *(via email)*
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