



May 23, 2022

Sent via E-mail and U.S. Mail

Ms. April Lazzaro
Senior Environmental Quality Analyst
Department of Environment, Great Lakes, and Energy
Air Quality Division, State Office Building
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, Michigan 49503-2341
LazzaroA1@michigan.gov

Re: Violation Notice Dated May 4, 2022

Dear Ms. Lazzaro:

On behalf of Industrial Stripping Services (“ISS”), this letter responds to AQD’s May 4, 2022 Violation Notice (“the VN”) concerning the recent replacement of a burn-off oven at the Grand Rapids facility. As explained below, ISS has already filed a PTI application with AQD to address the burn-off oven in question as well as another burn-off oven that ISS hopes to install this summer after receipt of the PTI.

As you know, ISS operates nine burn-off ovens at the Grand Rapids facility pursuant to two air permits, PTI #574-97 and PTI #168-01. After obtaining some new business orders from a client in the automotive industry, ISS elected to replace two of its older burn-off ovens with new and more efficient models. ISS believed that the existing air permits allowed for the simple replacement of the two older ovens with more efficient ones, but understands AQD’s position that new air permitting is required.

In response to AQD’s direction, ISS prepared a PTI application to address the two new replacement ovens. After reviewing the draft PTI application with AQD staff, ISS revised and submitted the completed application to AQD last week, on May 18, 2022. As noted above, ISS will not begin construction on the second replacement oven until after AQD issues a final PTI authorizing it.

Further, to protect against recurrence, ISS has also installed an internal corporate policy earlier this month. Under the policy, ISS personnel must review any potentially significant equipment maintenance, modification, or replacement for PTI compliance. In the case of any uncertainty about the compliance status of the proposed action, ISS will enlist the assistance and review of AQD staff, legal counsel, and/or a qualified air consultant.

I believe that this letter and the PTI application submitted last week provide a complete response to the VN, but please do not hesitate to contact me with any questions or concerns.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Frank Dopkiss". The signature is stylized with a large initial "F" and a long horizontal stroke.

Frank Dopkiss

C: Josh Zandstra, ISS