



EAGLE INDUSTRIES INC.

EAGLE INDUSTRIES, INC.
30926 Century Drive
Wixom, MI 48393

Phone: 248-624-4266
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8/4/2015

To: Department of Environmental Quality (DEQ)

From: Eagle Industries, Inc. Wixom, MI

Ref: Violation of Hydrocarbon Naphtha (CAS No. 64742-47-8) emission limit of 49,020lbs/ Year - ROP-N7578

To whom it may concern:

On 6/24/2015, Eagle Industries, Inc. was sited a violation for a reporting error on Hydrocarbon Naphtha (CAS No. 64742-47-8). The emission limit per year is 49,020lbs on ROP N7578. Eagle's data collection format did not include one of the releasing agents as its name (Hydrocarbon Naphtha) was not called out on the vendor VOC breakdown list. Sam Liverson noticed that CAS No. 64742-47-8 was called out on this VOC breakdown and although not specifically called Hydrocarbon Naphtha, it was intended to. Once this Hydrocarbon Naphtha value per pound was included into Eagle's reporting matrix, the total amount of Hydrocarbon Naphtha exceeded the emission limit per year.

Eagle staff, previous DEQ auditors/engineers, and independent ISO14001 auditors have not detected this previously as this was a complete oversight on all parties involved. No intentional falsification of documentation or intentional misreporting occurred. This was a mistake on all parties for reporting and verifying.

Eagle Industries, Inc. started using this release agent as of Jan 2012, so the misreporting period began at that time; however the exceeding limit started in Nov 2013 at 50,293lbs. This is an on-going violation until resolved with DEQ/ AQD. Below are the actions currently underway between DEQ/ AQD and Eagle Industries:

- 1.) Eagle Industries increased our roof stack heights from 37' to 40'.
- 2.) Eagle Industries submitted a claim to DEQ requesting an increase of the Hydrocarbon Naphtha emission levels from 49,020lbs/ year to 75,000lbs/ year. This request was on claim number (PTI 4-06), which was submitted on 7/25/2015. The claim will include manufacturing cell #'s 1, 2, 3, 5, 6, 8, 9, and 10.



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At this time, we have not received a response from DEQ. If needed, Eagle Industries is also willing to increase our roof stack heights again, but will wait for direction from DEQ on how to proceed.

Thank you for your time and support.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim McLaughlin", is written over a horizontal line.

Jim McLaughlin
Plant Manager
Eagle Industries, Inc.