



February 18, 2022

Via E-Mail

Department of Environment, Great Lakes, and Energy

Kaitlyn Leffert, Environmental Quality Analyst

Air Quality Division (Macomb County)

Dear Mrs. Leffert:

Response to Violation Notice (2/11/22)

On December 17, 2021, when you came out to our facilities to investigate a nuisance complaint about the smoke in the air. We took a tour of the outdoor torch area where we torch large machinery that comes in the yard as scrap. I also provide you with the contact information for the outside company (Summit Industrial Services) that does the torching for Basic Metals. At that time, we both that Basic Metals would be exempt from requiring a permit, because we were not torching for production, or a regular part of our business. Therefore, Basic Metals went forward with business as usual and continued allowing Summit to torch material.

When you came out on February 1, 2022, we were torching with the belief that we fit within the exemption to requiring a permit. After meeting with yourself and having it explained that we didn't fit within the exemption and a permit would be required. We participated in a conference call with yourself and Mark Mitchell (permitting division) about how to go forward with the permitting process. The conference call was very helpful and lead us to talk with Mike Kovalchick from the Flint area office.

Mike, put me in contact with Dan McGeen who oversees the Jackson area where Omni Source has one of the few permits actively issued in the State of Michigan.

After doing our due diligence and research Basic Metals has decided to no longer participate in outdoor torching. The difficulty and cost in trying to meet the standards in Michigan Air Rule 301 makes it almost impossible for us to economically continue with our current operations and meet compliance. Therefore, Basic Metals will not be seeking a permit from the State of Michigan and will discontinue its outdoor torching operations.

As we discussed in our prior meeting I'm not longer with Basic Metals. I have included frank Gerlando on this letter along with both owners Corey Plumb and Joe Gerlando, as Frank will be taking my place as safety coordinator.

Sincerely,

Jammie Kincaid, Basic Metals HR Safety Environmental Coordinator

CC: Frank Gerlando, Basic Metals

Corey Plumb, Basic Metals

Joe Gerlando, Basic Metals

Jeff Benaquisto, Summit Industrial Services