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Air Quality Division Detroit Office

BODYCOTE THERMAL PROCESSING · 38100 Jay Kay Driver ROMULUS · MICHIGAN - 48174 · TEL 313.414.6122 · FAX 313.557.0659 · www.bodycote.com

February 4, 2019

Ms. Katie Koster, Senior Environmental Engineer DEQ, AQD Detroit District 3058 W Grand Boulevard Suite 2-300 Detroit MI 48202

Re: SRN M4558, Wayne County

Dear Ms. Koster

I am writing in response to the recent inspection at our Romulus location and the resulting Violation Notice received at our office on January 25th.

Bodycote is committed to operating its facilities in full compliance with state and local regulations and looks forward to working with you to resolve this current situation. The three heat treatment furnaces of concern were installed sequentially over a period several months beginning in December, 2017. After the initial "burn in" (required to cure the refractory) they went through a series of process test loads to verify their capability to produce the required results. Since then they have been used intermittently for processing the customer's limited work load.

Unfortunately we experienced some internal miscommunication and this confusion resulted in our failure to complete and file the PTI documentation in a timely manner.

We are in the process of identifying the root cause and putting corrective action in place to prevent this from happening in the future. Our team is currently in the process of completing a current PTI application form and collecting the required information and documentation to compile a complete application package. To ensure we properly understand the PTI requirements, a member of our management team will be attending the upcoming DEQ Workshop entitled "2019 Permit to Install and Potential to Emit". To return to full compliance it is our intention to have the complete PTI application package submitted to the department within two weeks, no later than February 19. At this time we have no plans in the near future to install additional equipment that would require a PTI application.

Thank you for your assistance as we work to resolve this cited violation.

Sincerely,

Ahmad Hammoud & Bodycote Regional SHE Manager NAA

cc:

Ms. Jenine Camilleri