



**PREMIER THERMAL
SOLUTIONS**

DEQ-AQD LANSING D.O.

NOV 30 2018

Dale Feldkamp
209 W. Mt. Hope
Lansing, MI 48910
November 27, 2018

Michelle Luplow
Environmental Quality Analyst
DEQ, Air Quality Division
Lansing District Office, Constitution Hall
First Floor South
525 W. Allegan, P.O.Box 30242, Lansing, MI 48909

Dear Michelle Luplow:

This letter is in response to the Violation Notice dated November 5, 2018 for our Atmosphere Annealing, Bassett St. facility located at 1801 Bassett St., Lansing MI, 48915.

1. EU_Ammonia_01: Atmosphere Annealing does not have an emergency response plan for the anhydrous ammonia tank;
 - a. Cause: No method was in place to address an annual review of the emergency response plan for this location. The tank was installed in October of 2017 and though a response plan was developed on June 6, 2017 it did not address the addition of ammonia to the site and no follow up was done.
2. EU_Ammonia_01: The emergency response plan for the anhydrous ammonia tank has not been reviewed and approved by the local emergency planning committee;
 - a. Cause: No method was in place to address an annual review of the emergency response plan for this location and follow up with the local emergency planning committee.
3. EU_Ammonia_01: Records of the date of annual review and approval of the emergency response plan by the local emergency planning committee have not been kept.
 - a. Cause: No method was in place to address documentation of an annual review.

Corporate Office – 209 W. Mt. Hope Ave – Lansing, MI 48910 – (517) 485-5090
Subsidiaries: Atmosphere Annealing LLC: Lansing, MI - Canton, OH - North Vernon, IN

NitroSteel LLC: Pleasant Prairie, WI

www.PremierThermal.com



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Actions taken:

1. A written response plan has been updated by the local emergency planning commission and is in place. The plan was developed on October 23, 2018.
2. A line item requiring review of the plan has been added to our environmental compliance calendar to prompt an annual review of the plan and update as necessary.
3. Approval signatures from the local emergency planning committee have not yet been obtained as the emergency planning coordinator must obtain several signatures from different agencies.
4. A site plan review page has been added to the emergency response plan to address the record keeping requirements of the annual review.

If this response does not address your concerns associated with the violations identified in your letter, please feel free to contact me.

Sincerely,



Dale Feldkamp

Cc: Ms. Jenine Camilleri