

DEQ-AQD

SEP 17 2020

SAGINAW BAY

September 14, 2020

Ben Witkopp, Environmental Engineer  
Air Quality Division  
Department of Environment, Great Lakes and Energy  
Bay City District Office  
401 Ketchum Street, Suite B  
Bay City, MI 48708

Re: Plastic Trim International (Minth Group)  
935 N. Aulerich Rd.  
East Tawas, MI 48730  
State Registration No. N3592  
Response to Notice of Violation

Dear Mr. Witkopp:

Plastic Trim International, Inc. received a Violation Notice (VN) letter dated September 3, 2020 from your office. This notice identified two rule violations of improper stack heights of the paint line stack and the CO EX line stacks. The VN noted that the heights of these stacks are not 1.5 times the height of the building as required by the General Coating Permit #305-02, Condition VIII 1. These violations were discovered during an EGLE visit on July 22, 2020.

PTI understands that the stack height condition is required in order to meet the prerequisites of the General Coating Permit. Due to the proximity of the plant to the Iosco County Airport, PTI is unable to raise the stack to the proper height to satisfy the permit condition. When PTI applied for the General Coating Permit, we were unaware of the stack height limitation imposed by the airport.

Even though the stack heights were below the minimum requirements for the General Coating Permit, PTI believes the stack heights created no adverse air pollution impacts. PTI operates a state-of-the-art paint line and uses a regenerative thermal oxidizer (RTO) to control VOC emissions. The organic emission destruction efficiency of the RTO is estimated to be at least 95%.

Because PTI is unable to increase the stack heights, the stack height violations are ongoing. In order to correct these issues, PTI proposes to prepare an application for a new site-specific Permit to Install (PTI) that will incorporate permit conditions for the existing stack parameters. The application for the (PTI) will be submitted by September 30<sup>th</sup>, 2020

If there are any questions or additional information needed, please do not hesitate to contact me at (989) 362-4419 extension 2517, or [jerry.fitch@minthgroup.com](mailto:jerry.fitch@minthgroup.com).

Sincerely,

A handwritten signature in black ink that reads "Jerry Fitch". The signature is written in a cursive style with a large, prominent "J" and "F".

Jerry Fitch  
EHS Supervisor