

May 13, 2024

Nathanael Gentle
State of Michigan
Department of Environment, Great Lakes and Energy (EGLE)
Air Quality Division (AQD)
401 Ketchum Street
Suite B,
Bay City, Michigan 48708

Re: Minth Group, LTD
935 Aulerich Road
East Tawas, MI 48730
PTI No. 119-20

Dear Sir or Madam:

Cornerstone Environmental, Health and Safety (Cornerstone) has contracted with Minth Group LTD (Minth) to prepare a response to a Notice of Violation, dated April 22, 2024, and to assist with air permitting actions to be taken by Minth to correct the cited violations. This written response is due to Michigan EGLE by May 13, 2024.

1. Dates the violation occurred: April 11, 2024; during an EGLE on-site inspection and observation of a test for negative draft from Emission Unit EUCOATING.
2. An explanation of the causes and duration of the violations:
 - Positive pressure was observed at the top right corner of the cool down tunnel following the cure oven exit of EUCOATING.
 - Information provided in the PTI application regarding the air stream pathway and emission control of EUCOATING does not accurately reflect actual operation.
3. Whether the violations are ongoing:
 - The modification to the oven exit has been completed and the exit no longer has a positive draft from the opening.
 - Minth is currently working to modify their Permit to Install and has been in contact with MI EGLE Permit Section.
4. Summary of actions that have been taken and are proposed to be taken to correct the violations:
 - Minth has modified the oven exit to cool the exit gases and to prevent positive pressure locations along the exit opening. Tests of negative draft using visible “smoke” fumes demonstrated negative draft from the oven exit.
 - Minth has contracted Cornerstone to prepare a permit modification to update the Permit to Install (PTI). The modification will include updating information to reflect the emission unit as built and determining compliance with air regulations. Cornerstone has been in contact with MI EGLE AQD, Permit Section to begin identifying modifications to be made to the air permit.
5. Dates by which these actions will take place:
 - Minth completed the modifications to the oven exit on May 3, 2024.



- Minth signed a contract with Cornerstone to assist with preparing the permit modification on April 30, 2024.

6. What steps are being taken to prevent a reoccurrence: The modifications to the oven exit and the modification to the PTI will correct the root issues that caused the violations.

Should you have any questions or require additional information please do not hesitate to contact me at (513) 808-4097 or jnuckels@corner-enviro.com.

Best Regards,

John H. Nuckels
Senior Environmental Engineer

Enclosure

Cc: A.J. Hale, Minth Group
Jenine Camilleri, CamilleriJ@michigan.gov
4989 – 17803-05