



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

August 12, 2024

VIA EMAIL ONLY

John Zanti, Plant Manager
Minth Group LTD
935 Aulerich Road
East Tawas, Michigan 48730

SRN: N3592, Iosco County

Dear John Zanti:

SECOND VIOLATION NOTICE

On April 11, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed smoke tube testing of EUCOATING at Minth Group LTD located at 935 Aulerich Road, East Tawas, Michigan. As part of the smoke test observation, a site walk through was completed. The purpose of the test observation and associated site walk through was to determine Minth Group LTD's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 119-20.

On April 22, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), issued a Violation Notice (VN) to Minth Group LTD for EUCOATING. The AQD alleged that information provided in the Permit to Install (PTI) application regarding air stream pathway and emissions control of EUCOATING did not accurately reflect actual operation and that positive pressure was observed at the top right corner of the cool down tunnel following the cure oven exit. A response to the VN, provided by Cornerstone Environmental Health and Safety, Inc. (Cornerstone), was received on May 13, 2024.

Upon review of the Violation Notice Response, the AQD determined additional information was necessary to satisfy the response requirements outlined in the Violation Notice sent on April 22, 2024. In response, the AQD sent an Additional Information Request to Minth Group LTD on July 3, 2024. Information needed to fulfill the response requirements of the VN sent on April 22, 2024, were outlined in the Additional Information Request. This information included identifying the date(s) in which the violations occurred, providing additional information and explanation as to the cause of the air stream pathway and emissions control of EUCOATING operation not accurately reflecting the information provided in the original PTI application, changes made to the air stream pathway and associated control of EUCOATING since issuance of PTI No. 119-20, a list including timeline and description of such changes, and specifics as to the pathway and emission points of the air stream associated with each change. A date by which a PTI application will be submitted was also detailed to be needed as a written commitment.

As detailed in the Additional Information Request Letter, a written response to the letter was due by July 24, 2024. The AQD received a written response to the Additional Information

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Request on August 7, 2024, following a reminder provided to Minth Group LTD by AQD staff. The letter provided details on timeline and changes to the airstream pathway of EU COATING, an overview of stack testing recently conducted at the facility, and a timeframe for when an updated PTI application will be submitted.

The timeframe provided in which an updated PTI application will be submitted was the third or fourth quarter of this year. While the AQD appreciates the timeframe provided, a firm date by which Minth Group LTD commits to having a PTI application submitted has still not been provided.

Please provide a written response as to why a response to the Additional Information Request was not provided within the required timeframe. Please also include all information still needed to fully satisfy the response requirements of the April 22, 2024 VN, as outlined in the Additional Information Request, which includes a written commitment as to the date in which a PTI application will be submitted by. Please provide a written response to this letter by August 26, 2024, which corresponds to 14 days from the date of this letter.

Please submit the written response to Nathanael Gentle at EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or GentleN@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring Minth Group LTD into compliance, please contact me at the number listed below.

Sincerely,



Nathanael Gentle
Environmental Quality Analyst
Air Quality Division
989-778-0025

cc: AJ Hale, Minth Group
John Nuckels, Cornerstone
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Gina McCann, EGLE