



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

October 30, 2024

VIA EMAIL ONLY

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

SRN: N3592, Iosco County

Dear John Zanti:

**VIOLATION NOTICE**

On May 19, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), finalized Consent Order AQD number 2023-13 with Minth Group LTD. The Compliance Program and Implementation Schedule section of the Consent Order (ACO) outlines records which Minth Group LTD shall submit to the AQD. Upon review of records received, the AQD alleges violation of the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOATING	Consent Order AQD number 2023-13, Paragraph 10.	Quarterly report for Q2 2024 was not provided within thirty (30) days following the end of the full calendar quarter in which the data was collected.

Paragraph 10 of Consent Order AQD number 2023-13 states the following, "The Company shall submit four (4) quarterly reports containing records as described in EUCOATING, Special Conditions VI.4, VI.5, VI.6, and VI.7 of PTI No. 119-20, as amended, to the AQD Bay City District Supervisor. On and after the Effective Date of this Consent Order, each quarterly report is due within thirty (30) days following the end of each full calendar quarter in which the data were collected."

AQD records indicate a total of three (3) quarterly reports satisfying the requirements of paragraph 10 were received. These reports include records for the periods quarter 3 2023, quarter 4 2024, and quarter 1 2024. A quarterly report for quarter 2 (Q2) 2024 was received on October 25, 2024. The deadline for the Q2 2024 report was within thirty (30) days following the end of Q2 2024, which was July 30, 2024.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 20, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation;

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whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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.

If Minth Group LTD believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink that reads "Nathanael Gentle". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

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

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Gina McCann, EGLE  
Erin Moran, EGLE