

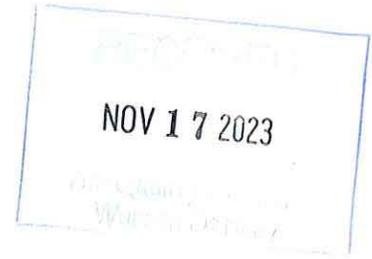


The Industry Leader in Coatings Removal
Chesterfield, MI

Via Certified Mail 7022 2410 0003 1452 6171

November 15, 2023

Mrs. Kerry Kelly
Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division, Warren District Office
27700 Donald Court
Warren, MI 48092-2793



**Subject: Response to Violation Notice
DuBois Chemicals, Inc. – Chesterfield, MI
Air Permit to Install (PTI) No. 127-16**

Dear Mrs. Kelly:

DuBois Chemicals, Inc. (DuBois) is pleased to submit this response to the Violation Notice letter received from the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) dated November 7, 2023. DuBois understands that the initial inquiry was based on complaints regarding chemical odors which were received by the EGLE, AQD on September 14 and September 21, 2023. The initial inquiry by the EGLE, AQD led to an additional inspection on October 11, 2023, that provided visibility that Oven 4 and Oven 5 were found to be able to operate while the afterburner temperature was less than 1,400 degrees Fahrenheit (F).

Violations cited (PTI 127-16, SC IV.1 and Rule 910): Records provided by DuBois Chemicals indicate DuBois Chemicals operated Oven No. 4 and Oven No. 5 while the afterburner temperatures were less than 1,400 degrees F.

- Response for Oven No. 4: The temperature setting was changed from 1,400 degrees F when the new controller was installed on April 17, 2023. It was corrected on November 8, 2023, and the controller has been locked so only the maintenance manager at the site can change it.
- Response for Oven No. 5: Upon further internal investigation, when the previous owner, Chemico Systems, purchased the oven Steelman Industries did not install the correct controller. DuBois immediately reached out to Steelman Industries for a quote for the new controller and wiring diagram to correct the issue and the work was completed at the site on November 13, 2023.
- Response No. 3: In order to ensure that this does not occur in the future the following administrative controls have been put in place:

- Any oven replacement project in the future will be reviewed by the DuBois Corporate Environmental, Health and Safety (EHS) Department to ensure that DuBois adheres to any applicable permit requirements.

DuBois appreciates your understanding and working with us on this issue. If you should have any questions concerning this information you may contact me at your convenience at (586) 638-5315, or by email at scott.bernard@duboischemicals.com.

Sincerely,
DUBOIS CHEMICALS, INC.



Scott Bernard
Plant Manager

cc: Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD
Jim Whitlock, COO
Andy Law, VP EHS & Quality
Compliance File