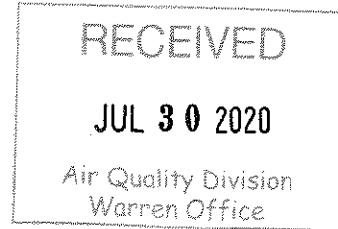


July 20, 2020

Kaitlyn Leffert
Michigan Department of Environment, Great Lakes, and Energy
Air Quality Division, Warren District Office
leffertk@michigan.gov



Dear Kaitlyn,

Violating Event:

On January 31, 2020 you performed an inspection regarding our air permit compliance in both Warren facilities. While inspecting 24600 Industrial Hwy (SRN: N5747) it was discovered that our temperature monitoring device on the RTO (Reverse Thermal Oxidizer) had not been calibrated since 2018. This violated the requirement to have them calibrated annually. The violation was dated March 17, 2020.

Cause:

Operation of the RTO as well as calibrations was previously handled by the maintenance manager. This position had changed several times over the past 2 years and this annual requirement was one that unfortunately fell through the cracks.

Describe Corrective Actions Taken Here:

- Calibration was done on June 26, 2020 (delay was due to being mostly shut down and not allowing contractors/visitors into the building during the COVID-19 pandemic)
- RTO Calibration has been added to the list of annual calibrations with all of our ovens and will be done at the same time.
- I was put into place as EHS lead in Warren and will ensure that these calibrations are done.
- Calibration due dates have been added to our tracking dashboard which is regularly reviewed by our corporate environmental supervisor in Green Bay

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Justin Engel".

Justin Engel
EHS Leader
Authorized Representative