

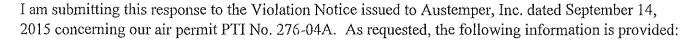
MI Department of Environmental Quality Southeast District Office Air Quality Division 27700 Donald Court Warren, MI 48092-2793

October 2, 2015

Attn: Mr. Remilando Pinga

Senior Environmental Engineer

Dear Mr. Pinga:



RECHIVED

OCT 0.5 2015

- 1) Dates violations occurred Reported salt usage and PM emissions for Years 2014 and 2015
- 2) Explanation of causes and duration of violations In years 2014 and 2015, some incorrect salt usage quantities were recorded in the salt usage/PM emissions log (spreadsheet) which resulted in inaccurate 12 month rolling salt usage and PM emissions calculations that generated quantities exceeding our permit limits. Quantities of reclaimed salt and salt disposed off-site were not accounted for in the recorded spreadsheet entries which should only include make-up salt usage quantities. This data entry error caused the miscalculation of new salt usage quantities and related PM emission levels that exceeded permit allowable limits.
- 3) Whether violations are ongoing No, data entry procedures have been corrected
- 4) Summary of actions taken to correct violations As of September 30, 2015 data entry procedures have been corrected to ensure accurate make-up salt usage and salt disposal values are entered into the salt usage and PM emissions spreadsheet. Revised 2014 and 2015 spreadsheets that include accurate make-up salt usage quantities are attached.
- 5) Steps taken to prevent reoccurrence Spreadsheet data entry procedures have been corrected and related training provided. The spreadsheet will also be routinely reviewed and checked for accuracy

Mr. Pinga, thank you for your assistance in addressing the permit recordkeeping issue and if you have any questions or require additional information, please contact me at 248-960-4700 ext. 2303 or cell 248-939-0208.

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Regards,

Wallace "Skip" James

Facilities Mgr.

Cc: Mr. Sam Domke, Austemper, Inc. Mr. Randy Junkins, JEI Solutions