

January 8, 2014

Ms. Dorothy Bohn
Michigan Department of Environmental Quality
Senior Environmental Quality Analyst
Air Quality Division
7953 Adobe Road
Kalamazoo, MI 49009

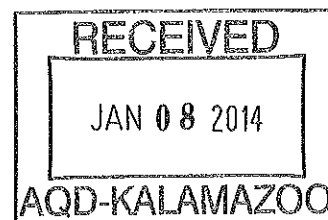
RE: Violation Notice
SRN: P0425, Kalamazoo County

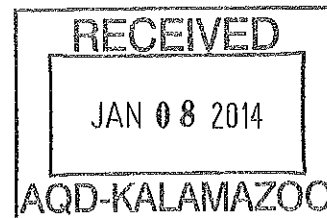
Dear Ms. Bohn,

This letter is in response to your letter/Notice of Violation dated December 18, 2013 and received December 20, 2013.

Process Description	Rule/Permit Condition Violated	DEQ Comments	LRR Comments
Hydraulic Shear	R 336.1201 (Rule 201)	The Facility has installed and operated a hydraulic shear to process stator bars containing asbestos without obtaining a permit	This violation is not ongoing. Hydraulic shear used November 12-18. No work will be conducted utilizing the hydraulic shear without first amending the permit.
EUWireStripper	PTI No. 34-13, Condition IV.3 and VI.2	The facility is not recording the pressure differential on the enclosure on an hourly basis.	This violation is not ongoing and it has been corrected. A copy of our automatic manometer data logger strip chart that we intend to use is attached. It runs continuously and if it fails, we will use our manual sheets (also attached).

Attachment A





Process Description	Rule/Permit Condition Violated	DEQ Comments	LRR Comments
EUWireStripper	PTI No. 34-13, Condition V.1 and 2	It does not appear that samples required in V.1 are being verified by an outside contractor every fifth operating day.	This violation is not ongoing and has been corrected. The analysis is attached. Sample forms that we use have been set up such that every fifth workday will indicate that the sample needs to be sent out.

Attachment B

EUWireStripper	PTI No. 34-13, Condition VI.1	The Facility has not performed any visible emission readings.	This violation is not ongoing and has been corrected. Hourly visible emissions form attached. We now have a form in place to record the visible emissions and have instructed all staff as to how and when to record such observations.
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Attachment C

EUWireStripper	PTI No. 34-13, Condition VII.1 and 2 40 CFR 61.145	The Facility has not submitted any of the required notifications.	This violation is not ongoing and has been corrected. The current NESHAPS notification currently in place is attached. We will continue to file NESHAPS notification as required.
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Attachment D

EUWireStripper	PTI No. 34-13, Condition VIII.1	The exhaust is not emitted through a stack, but into the building. This changes the parameters of the modeling that was performed.	This correction will be completed by January 13, 2014. This condition is being corrected by exhausting the HEPA exhaust out of a windowpane located six feet above ground surface.
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Attachment E

The following outstanding information is also provided herein as discussed on December 10, 2013:

1. Attached is a copy of the percent efficiency of the HEPA filter(s) in use on our Negative Air Machines (NAM). **Attachment F**
2. Third party analysis. **Attachment B**
3. Notification of installation of equipment stating when it was installed. **Attachment G**
4. List of all days that processing has occurred. **Attachment H**

In addition to those items requested in the Violation Notice, updated air monitoring data tables have also been included. **Attachment I**

Regarding comments made during the records review questioning the air monitoring locations: All samples are taken in the exact same location and those locations are selected as per all good industrial hygiene practice. These records were lacking organization and this has been corrected by speaking to the staff that works this process and stressing the importance of such data. We have adjusted the forms and have explained to all involved that the paperwork and recordkeeping while working this process is every bit as important as doing the actual wire stripping. I am keeping a close eye on this aspect of the work practices to help assure consistent organization and ultimately working within the Permit requirements.

To clarify two other comments: Bar Armor does not always contain asbestos and even though the material is actually non-friable, the Waste Manifests state that the material is "friable" because it is a requirement of the landfill.

A comment concerning our HEPA filter source was noted as "Flanders". I am not certain what Flanders is, however we get our replacement filters from Abatement Technologies.

During the last visit, a comment was made concerning "Mark's son and his friend" cleaning a trench. While it is true that Andre' DeLisle is my son and that he and Mat Benham are friends, they are both full time employees of DeLisle Associates LTD and are both fully licensed and certified to conduct the work required at the 9702 Portage Road facility.

Lastly, there was a comment/allegation made that it appeared that some wire had been processed between the two MDEQ visits. This allegation is absolutely not true. All work ceased until proper NESHAPS notification was made. Work resumed on December 30, 2013.

It is our intention to meet all of the requirements of our Permit No. 34-13 without exception. I hope that this letter and its attachments satisfy the Notice of Violation dated December 18, 2013.

Best Regards,
Lakeshore Reclamation & Resale LLC



Mark A. DeLisle
President