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August 14, 2019

Ms. Kaitlyn DeVries
Environmental Quality Analyst
Air Quality Division
EGLE
350 Ottawa Avenue NW, Unit 10
Grand Rapids, MI 49503-2341



Re: July 3, 2019 and July 24, 2019 Violation Notices to Kassouni Manufacturing, Inc.

Dear Ms. DeVries:

We represent Kassouni Manufacturing, Inc. ("KMI") with regard to the above-referenced Violation Notices. As I mentioned in my voicemail message to you last week, we have been working with KMI since being retained to gather facts necessary to respond to the Violation Notices and we have also been working diligently with KMI and the Ionia County Health Department to address related concerns regarding the storage and disposal of trichloroisocyanuric acid ("TCCA") powder. These efforts include retaining an environmental consulting firm with specialized personnel to guide the company in proper material handling and safety with regard to any future use of the TCCA and TCCA waste.

As indicated in the Violation Notices, the chlorine gas releases occurred on June 22, 2019 and July 19, 2019. To the extent that the violation of Rule 370(1) resulted from the failure to properly collect and dispose of the TCCA sweepings, any such violation was discontinued and ceased as of August 7, 2019. The following is a description of the actions which have been taken and which are proposed to be taken to correct the violation and prevent a reoccurrence of the violation.

All TCCA sweepings in the plant were containerized in EGLE-recommended "vented bung" containers. Safety-Kleen handled the containerization and will be removing the containers from the facility. The waste was fully containerized onsite as of August 7, 2019 and the containers will be removed from the site on August 16, 2019. In addition, KMI caused all TCCA products to be removed from the facility as of August 1, 2019. It has ceased all operations involving TCCA. The removal of TCCA and cessation of TCCA-related operations is subject to Order for Injunctive Relief ("Order") entered by the Ionia County Circuit Court on August 12, 2019, which was stipulated to by KMI and the Ionia County Health Department. In agreeing with the Order, KMI has agreed that it will not engage in any operations involving TCCA until it has implemented and is in compliance with several action items identified in the Order. A copy of the Order is attached as Exhibit A. At this point, KMI is working with the Ionia County Health Department, the Michigan Department of Health, EGLE and USEPA to develop the Standard Operating Procedures for TCCA storage, use and disposal identified in the Order.

We are also providing as Exhibit B the specifications for the baghouse collection system provided by Donaldson, the manufacturer of the system. A Malfunction Abatement/Preventative Maintenance Plan for equipment associated with TCCA tablet manufacturing process is being developed as part of the Standard Operating Procedures.

Please let me know if you need additional information or have further questions.

Very truly yours,

RHOADES McKEE PC

A handwritten signature in black ink, appearing to read "Scott J. Steiner", written over a horizontal line.

Scott J. Steiner

Attachments

cc: Ms. Jenine Camilleri, EGLE
Mr. Tom O'Malley, Kassouni Manufacturing, Inc.