



18900 Rialto Street * Melvindale, MI 48122
M (313-841-5400)

Sam Liveson
Environmental Engineer
Air Quality Division EGLE
Detroit District
3058 West Grand Boulevard
Suite 2-300
Detroit, Mi. 48202

July 14, 2021

Re: June 24, 2021 Violation Notice

Without question it is the intention of Peerless Metal to comply with all conditions of our Permit to Install PTI 34-19A. Please see below our response to the violation issues:

FGFACILITY

Record keeping- though put:

1. Natural Gas combustion records
 - A. non-compliant due to inaccurate billings/records from gas supplier (DTE)
 - B. non-compliant from start-up 12/2020
 - C. initiated internal logging of usage weekly
 - D. ongoing internal control to be verified by DTE records
2. Process through put records for FG-MELT
 - A. records had been recorded, but not in format to present
 - B. records will be submitted immediately under separate submission
3. Process through put records for ASPDRYSEG-1 and ASPDRYSEG-2
 - A. records had been recorded, but not in format to present
 - B. through put records directly correlate with FG-Melt records
 - C. records will be submitted immediately under separate submission

FGFACILITY

Record keeping- Emissions Records:

1. PM, PM10, and PMm2.5 emissions not calculated
 - A. non-compliant from startup 12/2020
 - B. contracted with Trinity Consultants
 - a.) Trinity to develop spread sheet to calculate (60 days)
 - b.) Spread sheet to be updated monthly
2. NOx, CO, VOC, individual HAP, and aggregate HAP emissions not calculated
 - A. non-compliant from startup 12/2020
 - B. Trinity consultants to verify usage and update calculations (60 days)

After burner of FG-DRYERCRUSHER:

1. After-burner temperature recordings less frequently than ever 15 minutes
 - A. non-compliant from startup 12/2020
 - a). immediately started recording every 15 minutes

Thank you for bringing these items to our attention We will comply with most of them immediately except for the items we feel we need Trinity Consultants to develop remediation plans for us which should take no more than 60 to 90 days. If there is anything we are missing or can further answer please feel free to contact myself or Clyde Robison.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Fuller', written in a cursive style.

Robert L Fuller Ex VP & GM
Peerless Metal Powders and Abrasives