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March 17, 2021

Jonathan Lamb  
Senior Environmental Quality Analyst  
MI EGLE Air Quality Division  
Cadillac Place  
3058 West Grand River Boulevard, Suite 300  
Detroit, MI 48202-6058

Subject: Saturation Indicator Violation Notice, January 21, 2021

Dear Mr. Lamb:

Thank you for the site visit that was conducted on January 21, 2021. In response to the written Notice of Violation, Republic Industrial and Energy Solutions, LLC (RIES) is submitting a description of corrective actions taken to address the lack of a saturation indicator on the carbon filtration system.

The filtration system was not operating from Jan 2018 to April 2020. During this time, the facility was owned by EGT with the intent to close the facility. RIES purchased the facility from EGT in October 2019 and operations resumed in April 2020. The VOC saturations were read daily by using a hand-held VOC meter at the midpoint of the filtration system. These inspections are recorded on the daily inspection sheet, Inspection Form A5-1.

Based on the saturation indication of the hand-held VOC meter, activated carbon filter media was changed in July 2020 and again on December 17, 2020. The measurements were not collected between December 17, 2020 and February 2, 2021 due to the misplacement of the handheld meter. Following the inspection on January 21, 2021 saturation indicators were ordered from TIGG LLC and installed on Feb 3, 2021. Since that time the indicators have been inspected and recorded daily. This will continue with activated carbon replacement based on the readings collected from the installed saturation indicators.

Should you have any questions regarding this response to the Notice of Violation dated March 3, 2021, please contact me at the number listed below.

Thank you and best regards,

  
Rick Sauve, MA, CHMM  
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