

2015 Dove Street Port Huron, MI 48060 Telephone: 810.966.9240 Facsimile: 810.966.9242

February 22, 2019

DEQ, AQD, Southwest Michigan District 27700 Donald Court Warren, MI 48092



Dear Mr. Ahammod:

This letter is to address MMC's violation notice dated February 7, 2019 regarding our EUWASTEEVAP under PTI 116-6B Special Condition I.1.

This violation was issued on January 18[,] 2019. This violation occurred at the end of the September 2018 reporting period where MMC was over our allowable 12 month rolling limit of 5.0 tons/year of VOC's for our clean-up water being evaporated through our natural gas-fired evaporator and continued until the end of January 2019.

The causes for being over our allowable limit was due in-part to MMC's expansion of our Coating Line 5 which has increased the amount of waste-water generated, as well as from our continued efforts in cleaning the plant and equipment.

MMC's interim actions beginning February 15th include evaporating only 900 gals per month of this waste-water to meet the permit requirements. Any waste-water generated above this 900 gals/month will be drummed-up and disposed of off-site at a water-treatment facility.

MMC's proposed, tentative long- term plan will be to de-commission the EUWASTEEVAP and replace it with newer technology. This newer technology consists of a Heat Pump Vacuum Evaporator that uses low temperature electrically generated heat to evaporate the waste-water and re-claim evaporated water from condensate that can be recycled (See attached possible equipment being reviewed by MMC).

If you need additional information or have any questions please contact me at 810-966-9240.

Thank you in advance for your consideration.

Sincerely.

Richard Rumohr Quality Assurance Manager

cc: Ms. Jenine Camilleri Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, MI 48909-7760