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September 30, 2019

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

Dear Mr. Ahammod:

This letter is to address MMC's violation notice dated September 12, 2019. This violation occurred beginning at 12 a.m. on August 22, 2019 and lasted until 2:15 p.m. the same day (totaling 14 hours and 15 minutes without running through the RTO). This constitutes a violation of SC IV.1 of FGCOATER (PTI No. 116-06B), and Rule 910.

The cause of the violation resulted from a fire that broke out inside the ductwork that leads to the RTO on top of roof at approximately 6 p.m. on August 21, 2019. The Fire Department put out the fire but damaged the duct work making the RTO ineffective. During the 14 hours and 15 minutes, MMC made repairs to the ductwork and continued to run production while bypassing the RTO in order to meet customer delivery demands. Once the repairs to the duct work were made, we began normal operations using the RTO.

The fire was a result of a tar-like substance or by-product that precipitates from the exhausted fumes from the Zinc Flake coating and condenses inside the duct work as it passes through to the RTO. MMC believes that if we insulate the duct work it will stay hot enough to eliminate the by-product from forming at all, thereby eliminating the risk of a repeated event of a fire.

MMC is currently reviewing our next steps and options to insulate the roof's duct work pertaining to the architectural characteristics. Timing for this project is pending at this time.

Sincerely,

Richard Rumohr

**Quality Assurance Manager** 

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