



SpaceRAK is a registered trademark of Heartland Steel Products, LLC
2420 Wills Street, Marysville, MI 48040
800.336.392

March 29, 2018

Matthew R. Karl
Environmental Quality Analyst
Air Quality Division (AQD)
Saginaw Bay District Office
401 Ketchum Street Suite B
Bay City, MI 48708

SRN: N1203; Sanilac County

Re: Violation Notice, PTI Number 738-85A

Dear Mr. Karl,

The purpose of this letter is to respond to a AQD Violation Notice, dated March 8, 2018, received by SpaceRAK. The DEQ Air Quality Division conducted an inspection of SpaceRAK (SRN #N1203), located at 6300 Karen Street, Marlette, Michigan. The Notice states that during a March 5, 2018 AQD inspection, SpaceRAK was unable to produce emission records upon request of AQD staff, which is a violation of recordkeeping and emission limitations specified in Special Conditions numbers 19, 20, and 21 of Permit-To-Install number 738-85A.

Since receipt of the Violation Notice, SpaceRAK has investigated the cause of the violation and initiated a plan for corrective action.

SpaceRAK contracts with Huron Consultants of Lapeer, Michigan to update and maintain emissions records on a monthly basis. Emissions of Volatile Organic Compounds (VOCs) are calculated monthly, as well as on a rolling 12-month period. Emissions of Hazardous Air Pollutants (HAPs), defined under Section 12 (b) of the Clean Water Act, are not calculated for SpaceRAK as no HAPs are present in any materials used in emitting operations.

SpaceRAK has historically maintained a digital file of these monthly VOC emissions calculations. In addition to digital records, SpaceRAK will maintain a binder of hard-copy records in the Marlette plant office, in order to improve accessibility to these records. These records will be kept on file for a period of five (5) years. Additionally, the records binder will be reviewed by Huron Consultants on a quarterly basis to ensure records are being kept up-to-date and consistent with SpaceRAK's PTI, as well as other applicable regulations.

Attached to this letter for your reference and review are the most recent VOC emission calculations and monthly usage logs.



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Thank you for bringing this matter to our attention. SpaceRAK will implement these improvements to our record-keeping process promptly. If you require any additional information, please do not hesitate to contact us.

Kind regards,

Wes Boyne,
Operations Manager

Cc: Huron Consultants – Daren McLaughlin, Owner