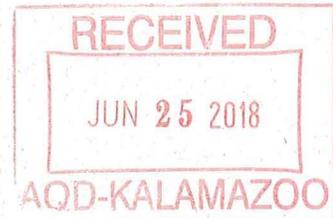


Banks Hardwoods, Inc.

21 June 2018

Mr. Dennis Dunlap
Michigan Department of Environmental Quality
Air Quality Division
7953 Adobe Road
Kalamazoo, Michigan 49009-5025

Re: Banks Hardwoods, Inc.
Letter of Violation dated 5 June 2018



Dear Mr. Dunlap:

This letter is being provided in response to the Letter of Violation (LOV) issued to Banks Hardwoods, Inc. (Banks) on 5 June 2018. The violation listed is in reference to Permit to Install (PTI) No. 361-05A at Banks' facility in White Pigeon, Michigan. The LOV states that Banks exceeded the coating usage limit for FGCOAT contained in the PTI.

The LOV requests information on the cause and duration of the nonconformance and steps taken to prevent a reoccurrence.

The exceedance of the coating usage limit was discovered during an MDEQ inspection conducted on 22 May 2018. It was a complete oversight by Banks who were maintaining the necessary records but didn't recognize the exceedance. The violation first occurred in June 2016 and has been ongoing since that date. It should be noted that although the total coating usage exceeded the limit, roughly 25% of the usage is related to a coating that does not contain any VOCs. If that amount was subtracted from the total, Banks would be in compliance with the usage limit. However, based on the wording in the PTI, it appears that Banks will need to modify the PTI in order to clarify what needs to be tracked and either increase the coating usage limit or replace it with a better limit.

Therefore, we have hired a consultant to assist with preparing the PTI application with the goal of submitting permit modification no later than 27 July 2018.

We believe that with the revised PTI, Banks will be able to maintain compliance going forward with the revised conditions and will be making changes to the record keeping to flag anything that reaches at least 75% of an associated PTI limit.

If you have any questions, please feel free to contact me at (269) 483-2323 x212.

Sincerely,



James F Clarke, President

cc: Ms. Jenine Camilleri, AQD
P.O. Box 30473
Lansing, Michigan 48909-7973

Ms. Mary Douglas
Michigan Department of Environment Quality
Air Quality Division
7953 Adobe Road
Kalamazoo, Michigan 49009-5025