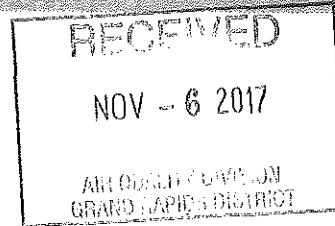




November 3, 2017



Mr. Adam Shaffer  
Air Quality Division  
Michigan Department of Environmental Quality  
350 Ottawa Avenue, NW, Unit 10  
Grand Rapids, MI 49503-2341

Re: Response to MDEQ Violation Notice, dated October 13, 2017  
USM Acquisition, LLC; 7839 Costabella Avenue, Remus, Michigan 49340 (SRN: N5101)

Dear Mr. Shaffer:

This letter is in response to the MDEQ-AQD Violation Notice (VN) dated October 13, 2017. The referenced VN alleges that USM Acquisition, LLC (USM) did not comply with environmental regulatory requirements and General or Special Conditions in Renewable Operating Permit (ROP) MI-ROP-N5101-2013b as described below:

MDEQ Item	Process Description	Rule/Permit Condition Allegedly Violated	Comments
1	FG-PLASTICCOMP	40 CFR 63 WWWW Table 4 and MI-ROP-N5101-2013b FGPLASTICCOMP Special Condition III.2	Unattended open containers of HAP containing material.
2	Dust Room	Rule 370(1) and MI-ROP-N5101-2013b General Condition 9	Improper handling of collected air contaminants.

**MDEQ Item 1:** The VN states that during the inspection unattended open containers of hazardous air pollutant (HAP) containing materials were observed. This would be in violation of both Table 4 – Work Practice Standards – of the National Emissions Standard for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production and MI-ROP-N5101-2013b, which state that all containers storing HAP containing materials be closed or covered, except during the addition or removal of materials.

**USM Response:** USM requested information from the MDEQ-AQD regarding specific containers, contents, and locations of the unattended open containers observed during the inspection. Unfortunately, the MDEQ-AQD was unable to provide this specific information, which would have been helpful for USM to confirm whether the contents of the containers were HAP containing materials, and if the containers met the definition of HAP-containing material storage in 40 CFR 63 WWWW.

One area for which MDEQ-AQD requested additional information was the patching area. USM uses disposable cups including 5 oz. Dixie cups for gelcoat, a small bottle for the catalyst, toothpicks, and Popsicle-type sticks to make small repairs to parts. These small cups are intended for immediate use, not storage. Use of small cups reduces both emissions and waste. It should also be noted, that mixing of the catalyst and resin in these small cups is not subject to the Rule as *mixing*, as defined under 40 CFR 63 WWWW, is the *blending of HAP-containing materials in vessels that are 5 gallons or larger*.

USM will review chemical handling and storing procedures with employees. USM will also place signs in the facility indicating all containers must be closed or covered at all times when not in use. The chemical storage review and sign posting will be completed by November 30, 2017.

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**MDEQ Item 2:** The VN states that during the inspection large amounts of white particulate matter (PM) were observed on the ground. The white PM was located adjacent to the Dust Room and was the result of improper handling of collected air contaminants.

**USM Response:** USM proposes to implement a program where designated personnel shall conduct periodic visual inspections of the interior and exterior of the Dust Room to determine whether cleanup procedures are necessary. USM is confident that these routine visual inspections will prevent a reoccurrence of a buildup of PM outside the Dust Room. This program will be in place by November 30, 2017.

As requested, a copy of USM's monthly usage record for each solvent cleaning material used from June 2016 through June 2017 is attached.

USM is committed to complying with all applicable regulatory requirements as well as all general and special conditions in MI-ROP-N5101-2013b. This letter should satisfy your request for response to the Violation Notice dated October 13, 2017. If you have any questions regarding these issues, or any others impacting environmental compliance at our facility, please contact me at 989.561.2293 or [monica@usmarble.com](mailto:monica@usmarble.com).

Sincerely,



Monica Roethlisberger  
Vice President  
USM Acquisition, LLC

Attachments

By email

cc/att: Christopher Robinson – MDEQ  
Stephanie A. Jarrett, PE – FTCH