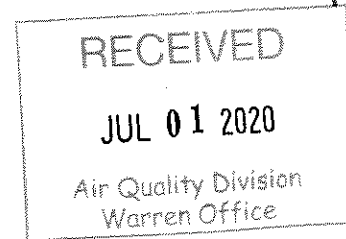




June 23, 2020

Kerry Kelly
Senior Environmental Quality Analyst
Air Quality Division
Department of Environment, Great Lakes, and Energy
27700 Donald Court
Warren, MI 48092-2793



RE: SRN N5722, Macomb County

Dear Kerry Kelly,

On June 11, 2020, your office sent a letter to Chemico Systems, Inc. regarding inspections of the Chemico facility on March 13 and 17, 2020. The inspection was prompted by a complaint on March 11, 2020 involving chlorine odors.

Until March 16, 2020, Chemico Systems, Inc. was responsible for all operations at 50725 Richard West Boulevard in Chesterfield. However, effective, March 16, 2020, the coatings removal operations at that facility were sold to DuBois Chemicals, Inc. Chemico Systems, Inc. continues to conduct operations at the same building. The businesses of DuBois and Chemico are separated by a wall. This response letter is provided by DuBois Chemicals, Inc. With this letter, we do not intend to respond on behalf of Chemico Systems, Inc. or any other neighboring business.

At the time of the two inspections, the paint removal ovens that are part of the coatings removal business now operated by DuBois were observed to be within proper operational ranges during the time of the complaint. We do not believe the ovens or paint removal operations in our location were the source of the chlorine odor that was identified by the complainant. However, during the investigation, it was determined that certain monitoring/recording requirements in our air permit were not fully meeting the permit requirements. Specifically, the thermocouple wires for ovens 1 and 2 had been disconnected on October 15, 2019 in preparation for the relocation of those ovens. That relocation project was not completed. Manual records were kept for the required parameters, but only hourly; not every 15 minutes as required by the air permit. On March 17, 2020, the afterburner thermocouple wire for oven #1 was re-installed to our monitoring device to regain compliance. Once additional thermocouple wire was obtained, we were able to install it on the primary burner for oven 1 and both the primary and afterburners for oven #2 on May 11, 2020. It should be noted that even though oven #2 is not currently in use, it has not been officially decommissioned.

In the months prior to the acquisition of the coatings removal operation by DuBois Chemicals, consultants performed a review of compliance, but unfortunately the issue with the

monitoring/recordkeeping equipment being disconnected was not identified. As soon as DuBois Chemicals became aware of this deficiency, actions began to correct the errors.

The monitoring/recordkeeping deficiencies have been corrected. We apologize for the error.

Please feel free to reach out to us with any questions or concerns in regard to this violation and our corrective actions.

Best Regards,
Christopher G. Dickson



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