



The Industry Leader in Coatings Removal
Chesterfield, MI

Via Certified Mail 7022 2410 0003 1452 6188

October 5, 2023

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



**Subject: Response to Violation Notice
DuBois Chemicals, Inc. – Chesterfield, MI
Air Permit to Install (PTI) No. 127-16**

Dear Mrs. Kelly:

DuBois Chemicals, Inc. (DuBois) is pleased to submit this response to the Violation Notice letter received from the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) dated September 26, 2023. DuBois understands that the initial inquiry was based on recent complaints regarding chemical odors which were received by the EGLE, AQD on September 14 and September 21, 2023. The initial inquiry by the EGLE, AQD on September 21, 2023, led to the discovery that the afterburner temperatures had not been recorded since September 6, 2023, due to a power outage that the plant experienced on that day.

- Violation cited (PTI 127-16, SC VI.3): On September 22, 2023, Scott Bernard, DuBois Chemicals, notified AQD via phone that the company had not recorded the afterburner temperatures between September 6, 2023 and September 22, 2023. Scott stated that temperatures were not recorded due to a failure to reset the monitoring system following a power outage.
 - Response No. 1: The violation was discovered and corrected on September 21, 2023, when it was first discovered. Afterburner temperatures restarted recording as required on September 21, 2023, at 8:21pm Eastern Standard Time (EST).
 - Response No. 2: The violation was caused when the backup battery for the monitoring system failed, thereby allowing the system to stop monitoring and it did not re-start monitoring when plant power was restored. In order to address the issue with the backup battery, the entire monitoring system was replaced on September 25, 2023. While temperatures were recorded with the previous monitoring system up to the time of the replacement and manual readings were taken from 12:30pm to 1:55pm during replacement, it was determined after the replacement that data from September 22, 2023, at 6:48am to September 25, 2023, at

12:30pm were not downloaded from the previous monitoring system and those records are not available.

- Response No. 3: In order to ensure that this does not occur in the future the following administrative controls have been put in place:
 - A visual check of the temperature recordings has been added to a daily site checklist to ensure visibility to any issues in a timely manner.
 - The replacement of the battery for the battery backup unit will occur every 6 months and will be added to our internet based Environmental, Health and Safety (EHS) software system by October 6, 2023.

DuBois will continue to work to reach a consistent and sustained performance for this regulated air emission source. DuBois sincerely appreciates your understanding and working with us on this issue. If you should have any questions concerning this information you may contact me at your convenience at (586) 638-5315, or by email at scott.bernard@duboischemicals.com.

Sincerely,
DUBOIS CHEMICALS, INC.



Scott Bernard
Plant Manager

cc: Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD
Jim Whitlock, COO
Andy Law, VP EHS & Quality
Compliance File