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January 4, 2017

State of Michigan
Department of Environmental Quality
7953 Adobe Road
Kalamazoo, MI 49009-5025



RE: SRN N8328, Cass County. Inspection

To All Concerned Parties,

V1.2.f of PTI

On November 30, 2016, an inspection occurred at our facility, Southern Michigan Rubber, Inc. We were found to be in violation 6 areas.

Eucureoven	Special Condition II.1 of PTI No. 203-09	More than 10,000 pounds of rubber cured in the cure oven during a 12-month rolling time period.
Eucureoven	Special Condition V1.2.f of PTI No. 203-09	Hours of operation not kept on a daily basis.
Euautoclave	Special Condition V1.2.f of PTI No. 203-09	Hours of operation not kept on a daily basis.
FGPlaten Presses	Special Condition V1.2.f of PTI No. 203-09	Hours of operation not kept on a daily basis.
Operation of an Autoclave	R3336.1201 (Rule 201)	Failure to obtain a PTI prior to installation of a second autoclave.
Installation and Operation Of a Cure Oven and Autoclave.	R3336.1201 (Rule 201)	Failure to obtain a PTI prior to installation of new equipment following a fire.

In December 2011, my brother, Brad Riley passed away very unexpectedly, leaving me with stepping in to try to fill his shoes. When we had originally applied for the permit, he had sat down with someone from the DEQ to

assist with initiating our program and acquiring the necessary permits. In June of 2013 we had a catastrophic fire and lost 70% of our lathe rubber manufacturing process.

In the aftermath and trying to replace the building, equipment, and keeping our employees employed, I neglected to realize that I would need a new permit to continue the operations that we had lost during the fire. The fire affected our Eucureoven and Euautoclaves. Although the second autoclave was somehow missed in the original permit also.

Evidently, we have been in violation of the second autoclave since we first applied for the permits, although, we have stayed under our total usage allowance. We will apply for a new permit.

We have already added on the total hours per day calculations to our worksheets and will inservice the users as to the recording procedure changes. The TSO calculations have already been added into the spreadsheet calculations as well.

I have signed up for and will be attending the February 9, 2017 , Air Permit to Install Workshop. I anticipate that we will get our new permits filed for at that time and we will apply for permits that correctly reflect our new usages.

I appreciate the time, effort and willingness of the DEQ to help me in this process. I look forward to being totally compliant in the very near future.

We will continue to collect the old data, along with the addition of the new to us, data on a daily basis.

Sincerely,



Marel Riley-Ryman
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