

CUTTING EDGE ABRASIVES, LLC
4455 AIRWEST DRIVE
KENTWOOD, MI 49512

November 22, 2023

Ms. April Lazzaro, Senior Environmental Quality Analyst
EGLE-AQD Grand Rapids District Office
State Office Building
350 Ottawa Avenue, NW
Unit 10
Grand Rapids, Michigan 49503-2341



Re: Response to Violation Notice
Cutting Edge Abrasives (SRN: N6647)

Dear Ms. Lazzaro:

This letter is in response to the Violation Notice from EGLE-AQD, dated November 14, 2023. Your letter addresses an exhaust stack installed outside of the resin processing area for FGPROCESS and above the area where the electric drying oven conveyor exits the oven.

During the recent permit evaluation, it was determined that the resin processing area ventilation stack was insufficient for proper dispersion of the volatiles from the resin process area. As agreed upon we contracted with a ventilation company to modify this stack. However, there appears that we had an internal mis-communication between myself and our plant manager on the scope of the project. Instead of replacing the resin process ventilation stack, a second stack was also installed in the general area above the conveyor exit to the electric drying oven. The oven exit is actually situated outside the resin process production area and not physically connected to the oven but above to an area above the conveyor exit to collect any residual carryout.

It should be noted that both stacks are identical with the same specifications (stack exit diameter, height above grade, and air flow rate). So, as a result, instead of replacing the one stack, we have installed two stacks, each discharging at the same elevation, with the same discharge velocity. As you have discussed with our consultant, Bruce Connell from Environmental Partners, we have two options: 1) remove the stack above the oven exit area, or 2) modify the recent air permit (101-23) to incorporate the additional stack (SV-OVEN). At your request, we agree to submit a permit modification application to the Permit Section to incorporate this exhaust stack. We have already been in contact with permit engineer Andrew Banitt and believe that we can have this application submitted by December 15, 2023.

We sincerely apologize for the mis-understanding surround this additional stack. Should you have any questions regarding the above outlined event and planned course, please contact me either by e-mail at tdyer@surfaceprep.com or by telephone at 616-292-5196.

Sincerely,

Tim Dyer

Tim Dyer, Member

cc: Annette Sitzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE