



Date: 7/21/23

Via E-Mail and U.S. Mail

Chris Robinson

350 Ottawa Ave. NW Unit 10

Grand Rapids, MI 49503

RobinsonC17@michigan.gov

Dear Chris,

Padnos Manufacturing (Padnos) operates under Permit to Install (PTI) numbers 365-98A and 182-80C. This letter will address the Violation Notice dated June 30, 2023. The alleged violation was for failure to maintain the company's Malfunction Abatement Plan (MAP) for EUCORECODRYER, EUBRIQUETTER, and the EUTURNINGSCRUSHER.

After internal investigation, it was determined that the MAP was not updated to reflect the upgrade of bags used in the baghouses. Padnos upgraded the baghouse bags to a "15oz Scrim Supported Acrylic Felt with BHA's Preveil ePTFE membrane Laminate" and a "10oz Electrical Grade Continuous Filament Fiberglass Heat Cleaned with 10% PTFE Finish with BHA's Preveil ePTFE Membrane Laminate" baghouse bags. These bags represent an "upgrade" to the prior bags that were used (and referenced in the MAP) because they are pre-conditioned (ready-to-use), more expensive, last longer, and provide greater potential control efficiency.

Padnos is currently revising the MAP to ensure the proper operating ranges listed in the MAP correspond with the proper, operating ranges for the EUCORECODRYER, EUBRIQUETTER, and the EUTURNINGSCRUSHER. Padnos proposes to submit an updated MAP to you by the end of this month.

If you have any questions, please contact me at any time.

Thanks,

Kyle Daneff

Environmental Manager | PADNOS | Paper, plastics, metals and more...

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