



1620 East Holland Avenue  
Saginaw, MI 48601  
(989) 755-0441 Fax: (989) 755-0445

February 11, 2022

EGLE, AQD  
Bay City District  
401 Ketchum Street  
Suite B  
Bay City, MI 48708

RE: B1995

Dear Ms. McCann

In response to Violation Notice B1995, US Graphite, Inc has reviewed our procedure regarding our recording keeping and permitting of equipment in Building 2 of our 1620 E Holland Saginaw, MI 48601 facility.

On November 4, 2021, an inspection to determine USG's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) numbers 111-12A, 230-07, 694-92, 507-92, 506-92, 503-92, and 223-70 was done. In addition, the inspection was conducted to investigate recent complaints which we received on October 8, 2021, June 3, 2021, and March 27, 2020, regarding fugitive dust and sulfur odors attributed to graphite manufacturing operations.

The investigation determined that proper record keeping was not maintained in an acceptable format and that a piece of equipment was not permitted in Building 2.

At this time, the record keeping issues have been resolved. On January 20, 2022 the updated records through December 2021 were emailed to Ms. Gina McCann. Records for January 2022 are enclosed. These records will be maintained and made available monthly.

With regard to the permitting issue, at this time, we are decommissioning the equipment. We will disconnect the gas line and either 1) remove a door or 2) remove the controller so it cannot be reconnect and utilized easily. It is not currently being used but should it be put back into service, we will have permits completed.

To prevent a future issue, we have assigned the record keeping to a technician who will submit it to the Quality Manager. With regard to the permitting, we anticipate the decommissioning will be complete in sixty days or the permitting process will begin. The equipment will not be used until permitting is completed.

We believe these mitigation measures will resolve the issues.

If you have any questions, please feel free to reach out to me.

Regards,

A handwritten signature in black ink, appearing to read 'Sarah Witgen', with a long horizontal flourish extending to the right.

Sarah Witgen  
Director of Human Resources

Cc:

Ms. Jenine Camilleri  
Enforcement Unit Supervisor  
EGLE, AQD  
PO Box 30260  
Lansing, MI 48909-7760

<u>ITEM DESCRIPTION</u>	<u>VENDOR NAME</u>	<u>INV. UNITS</u>	<u>PER/UNIT</u>	<u>JANUARY</u>
TYPE 1- PHENOLIC RESIN CRC-720	CAPITAL RESIN CORP	DRUMS	500 LBS. PER 55 GAL. DRUM	36 GAL
TYPE 1 PHENOLIC RESIN DUREZ 07347A	TLC INGREDIENTS	DRUMS	500 LBS. PER 55 GAL. DRUM	0
PERMAFIL #3255	ELECTRICAL INSULATION	DRUMS	PER 55 GAL. DRUM	0
LUPEROX P (PERMAFIL CATALYST)	SIGMA ALDRICH CHEMICAL	BOTTLE	PER 500 GRAM BOTTLE	0
DIALLYL PHTHALATE MONOMER (PERMAFIL DILUTENT)	SIGMA ALDRICH CHEMICAL	BOTTLE	1 LITER PER GALLON BOTTLE	0
TYPE 4 RESIN NC-1012	CAPITAL RESIN CORP	DRUMS	450 LBS. PER 55 GAL. DRUM	68 GAL
DIETHYL SULFATE (TYPE 4 CATALYST)	SIGMA ALDRICH CHEMICAL	4kg or 2kg Bottles	8.8 LBS PER (4kg Per Bottle)	0
TYPE 5 RESIN EPON 815C	MATTESON RIDOLFI	DRUMS	200 LBS. PER 55 GAL. BARREL	70 GAL
B-550 CURING CATALYST (TYPE 5 CATALYST)	LEEPOXY PLASTICS INC	BOTTLE	GALLON	0
HELOXY 61 (TYPE 5 DILUTENT)	MILLER STEPHENSON	CAN	GALLON	1 GAL
MONOALUMINUM PHOSPHATE	INTERSTATE CHEMICAL	CARBOY	185 LBS. PER 55 GAL. BARREL	0