



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

September 1, 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.

The piece of equipment that was identified as not permitted in Building 2 was decommissioned. The gas line was disconnected, the controller removed and the door removed. It is not currently being used but should it be put back into service, we will have permits completed.

It was later determined that that a furnace was placed in the 1510 facility to replace an existing furnace. The original furnace was electric and the replacement was gas. It was determined that because of the differing fuel sources, a permit would now be required. At this time, that furnace has been decommissioned and not in use. It is not connected to any power supply (gas or electric). It is therefore not currently being used but should it be put back into service, we will have permits 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 that reads "Sarah Witgen". The signature is written in a cursive style with a large, looped initial "S".

Sarah Witgen  
Director of Human Resources

Cc:

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