



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE

EGLE
LIESL EICHLER CLARK
DIRECTOR

January 21, 2021

Ms. Sarah Witgen
U.S. Graphite
1620 East Holland Avenue
Saginaw, Michigan 48601

SRN: B1995, Saginaw County

Dear Ms. Witgen:

VIOLATION NOTICE

On November 4, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of U.S. Graphite (USG) located at 1621 Holland Avenue, Saginaw, Michigan. The purpose of this inspection was 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. 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.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EURESINTREAT	PTI 111-12A, SC VI.3.	Records are not being kept to determine compliance w/VOC emission limit in 1.1.
EURESINTREAT	PTI 111-12A, SC VI.4.	Records are not being kept to determine compliance w/material limit in 11.1.
EURESINTREAT	PTI 111-12A, SC VI.3.	Records are not being kept to determine compliance w/material limit in 11.2.
Oven in building 2	R 336.1201	1 MMBtu/hr oven installed to cure resin on parts.

During this inspection, USG was unable to produce emission records associated with the resin treatment process (EURESINTREAT). This is a violation of the recordkeeping and emission limitations specified in Special Conditions VI.3 and VI.4 of PTI number 111-12A.

During this inspection, it was noted that USG had installed and commenced operation of unpermitted equipment at this facility. A 1 MMBtu/hr oven was installed in building 2 to cure resin onto parts and a permit was not obtained. AQD staff advised USG on January 18, 2022, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

A program for compliance may include a completed PTI application for the oven in building 2. An application form is available by request, or at the following website: www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 11, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If USG believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Sarah Witgen
U.S. Graphite
Page 3
January 21, 2022

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of USG. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Gina L. McCann". The signature is fluid and cursive, with the first name "Gina" being the most prominent.

Gina L. McCann
Senior Environmental Quality Analyst
Air Quality Division
989-439-2282

cc: Mr. Bill Burns, USG
Mr. Bill Griffus, USG
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE