



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 17, 2022

VIA EMAIL ONLY

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

SRN: B1995, Saginaw County

Dear Sarah Witgen:

VIOLATION NOTICE

On March 3, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), visited U.S. Graphite located at 1621 Holland Avenue, Saginaw, Michigan. The purpose of this visit was to determine if U.S. Graphite's actions taken to correct the violation issued on January 21, 2021 resolved the non-compliance issues and what steps were being taken to prevent a reoccurrence.

During this visit, a verbal warning was given for the installation of a natural gas fired oven as a replacement for a permitted electric oven under Permit to Install (PTI) number 111-12A. AQD has not received a permit application for this equipment.

During the field visit, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EURESINTREAT	General Condition 1 of PTI 111-12A R 336.1201(1)	Installation of a natural gas fired oven in replacement of a permitted electric oven.

During this visit, it was noted that U.S. Graphite had installed unpermitted equipment at this facility. The AQD staff advised U.S. Graphite on March 3, 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 EURESINTREAT process equipment. An application form is available by request, or at the following website: www.michigan.gov/air.

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.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 7, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If U.S. Graphite 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.

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

Sincerely,



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

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Chris Hare, EGLE