



March 20th, 2023

Via Email

Michigan Department of Energy
Environment & Great Lakes
Air Quality Division
Marquette District Office
1504 W. Washington St.
Marquette, MI 49855
Attention: Mr. Joseph Scanlon
ScanlanJ@michigan.gov

RE Michigan Department of Energy, Great Lakes, and Environment (“EGLE”) Violation Notice dated February 7, 2023 and Second Violation Notice dated March 6, 2023

Dear Mr. Scanlon:

On behalf of Boss Products (“Boss” or the “Company”) the following provides a response to the above-referenced Violations Notices (“VNs”) following your December 2, 2022 inspection. The Company provides this response in efforts to amicably resolve the VNs and to outline corrective actions taken by the Company following EGLE’s inspection. As we discussed in our email exchange last week, the Company’s delayed response is the result of my being out on an extended medical leave without replacement, as I just returned to work March 14. Given my leave, the Company appreciates the short extension you provided to respond until March 22, 2023.

Alleged Violation #1: Afterburner is not maintained or operated in a satisfactory manner.

Response 1: The burn off oven (including the afterburner) has been added to the Company’s Electronic Maintenance System which will ensure all required inspections and service are conducted timely in the future (see also response to Alleged Violation #2).

Alleged Violation #2: Afterburner temperature monitoring device is not calibrated, maintained, or operated in a satisfactory manner: temperature readings are not recorded in 15-minute increments.

Response 2: The thermo-coupler for the afterburner has been replaced and calibrated and is now scheduled to be replaced and calibrated on a four times per year basis under the Company’s Electronic Maintenance System. [In addition, the Company has ordered extra thermo-couplers to hold in inventory to replace any thermo-coupler if necessary between future scheduled quarterly replacements.]

The Company has also made adjustments to its recording software to ensure afterburner temperatures are recorded every 15-minute instead of the previous 30-minutes in accordance with Section SC VI. 1 of the Company’s PTI.

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Alleged Violation #3 – Batch records are not kept in a satisfactory manner.

Response 3: The Company has been developed a spreadsheet that more clearly records batch information, including monthly batch totals and 12-month rolling batch totals. This spreadsheet, which is attached, includes batch information dating back to July 1, 2022, and will be used by the Company to record batch information moving forward.

The Company submits this response under a full reservation of rights, privileges and defenses. If there any further questions or concerns, please feel free to contact me at any time via email, at Bill.cobb@bossplow.com or via phone at (906)-776-3654.

Sincerely

Bill Cobb

Bill Cobb, CSP
Safety Manager

cc: Colleen Hart
Jenine Cammilleri, EGLE Enforcement, AQD (CamilleriJ@michigan.gov)