

From: [Pat Cell](#)
To: [Shaffer, Adam \(EGLE\)](#)
Cc: [KuiECK, Sue](#)
Subject: Violation Notice Response
Date: Wednesday, April 1, 2020 8:20:52 AM

Hi Adam

This email is in response to your March 6, 2020 violation notice received by Reliance Finishing Company (Reliance) on March 9, 2020. I apologize for the delay in this response. Due to the March 24, 2020 Executive Order issued by Governor Gretchen Whitmer requiring that activities that are not necessary to sustain or protect life be suspended until April 13, 2020, operations at Reliance have been significantly scaled back and I've been trying to minimize time spent in the office. Although this response is after your requested response date of March 27, 2020, Reliance has begun addressing your concerns noted in the violation.

As discussed with you during our March 12, 2020 conference call, Reliance has hired Fishbeck to prepare and submit a request for modification of PTI No. 306-96B to allow EUCLEANOVEN to be used to dry sediment from several of our cleaning tanks. Following that discussion, Reliance immediately began tracking the quantities and types of batches that our maintenance personnel use EUCLEANOVEN to process. However, because of the governor's orders, the operation of our processes have been minimal and we have not been able to obtain enough data to properly characterize the materials that may be dried in the future. Reliance has had further discussions with our maintenance personnel to identify those wastes that necessitate use of EUCLEANOVEN in this matter and has found alternative means of disposing of several of the waste streams.

Unfortunately, the sampling data Reliance currently has on file is for the cake from the filter press, which represents a very small quantity of the potential throughput of EUCLEANOVEN. Reliance will need some time following the lifting of the Executive Order to take some samples and have them analyzed to help determine the potential toxic air contaminant emissions from the process. Reliance will pull samples within the first two weeks of full operation following the lifting of the Executive Order. Reliance will also further investigate the waste streams and obtain data to assist with the permit review once we resume full operation.

In the meantime, Fishbeck will begin work on the permit and regulatory review as discussed during our conference call in order to expedite the submittal once the data is available. Reliance anticipates submitting the permit within one month of the lifting of the Executive Order but will provide you with an update once we are back to full production volumes. We really appreciate you working with us to achieve compliance.

If you have any questions or require further information at this time, please contact me at 616-241-4436 or email at patc@relfn.com.

Sincerely,

Patrick Cell

General Manager

Reliance Finishing Co.

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