



May 25, 2022

Nathanael Gentle
 EGLE, AQD, Bay City District
 401 Ketchum Street, Suite B,
 Bay City, Michigan 48708

Re: **Violation Notice N3592 Initial Response**
 Minth Group LTD (formerly Plastic Trim International)
 935 Aulerich Road
 East Tawas, MI 48730
 Permit to Install # 119-20

Dear Mr. Gentle:

The Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) issued a Violation Notice N3592 (Violation Notice) to the Minth Group LTD (Minth) located at 935 Aulerich Road, East Tawas, Michigan. The Violation Notice outlined observations made by the AQD during an April 21, 2022 inspection that appeared to show deviations from the requirements of Permit to Install No. 119-20 (PTI). The purpose of this letter is to provide an initial response to EGLE to the Violation Notice.

Minth has contracted Cornerstone Environmental, Health and Safety, Inc. (Cornerstone) to assist with the initial response and any corrective actions to this Violation Notice. A summary of the EGLE’s inspection findings and Minth’s response is provided in the table below.

Violation Notice Summary and Initial Response Minth Group LTD (formerly Plastic Trim International) East Tawas, MI PTI No. 119-20			
Process Description	Alleged Rule/Permit Condition Violated	Possible Cause and Duration	Summary of Actions Taken
Malfunction Abatement Plan (MAP) for EUCOATING	PTI No. 119-20 EUCOATING Special Condition (S.C.) III.5	MAP not submitted within 45 of permit issuance (June 14, 2021).	Draft MAP is being reviewed by Minth. It will be submitted to EGLE within 30 days of this letter.

Continuous monitoring and recording of the temperature in the combustion chamber of the thermal oxidizer.	PTI No. 119-20 EUCOATING S.C. VI.2 and VI.8	Facility has not maintained records for RTO combustion chamber temperature since PTI was issued on April 30, 2021.	The RTO combustion chamber is continually monitored electronically. If the combustion temperature drops below 1400° F, the paint line emitting to the incinerator will automatically shut down. This has not occurred since the current PTI was issued. Minth, however, has not maintained records of the combustion chamber temperature. Minth is working to contract a vendor who will extract and record monitoring data from the RTO. This is expected to be completed within 90 days of this response letter.
Testing to verify the VOC destruction efficiency of the RTO	PTI No. 119-20 EUCOATING S.C. V.3	A copy of the test report was not received within 60 days following the completion of testing on December 22, 2021.	The full test report has been submitted to the EGLE.
Smoke test to verify the direction of airflow at each natural draft opening (NDO).	PTI No. 119-20 EUCOATING S.C. V.2	Minth is required to complete a smoke test within 180 days (October 27, 2021) from the issuance of the PTI and semi-annually thereafter. To date this testing has not been performed.	Minth has contracted Cornerstone to prepare a smoke test protocol and train key personnel on the protocol and procedures. The protocol, training and initial testing will be completed within 90 days of this letter. Training will occur in the future as necessary to maintain compliance with this condition.
Records of coating usage and VOC emissions for EUCOATING	PTI No. 119-20 EUCOATING S.C. VI.4	Records of coating usage is maintained in an internal Minth database known as the Flex system. VOC emission calculations have not been prepared since PTI No. 119-20 was issued on April 30, 2021.	Minth has contracted Cornerstone to prepare reports of coating usage and VOC emissions starting May 1, 2021. These calculations will be prepared and submitted to EGLE by July 30, 2022, and quarterly thereafter.

Records of solvent used and reclaimed and VOC emissions for EUCOATING.	PTI No. 119-20 EUCOATING S.C. VI.5	Records of solvent usage and reclaim and VOC emission calculations have not been maintained since the PTI was issued on April 30, 2021.	Minth has contracted Cornerstone to prepare reports of solvent usage, reclaim and VOC emissions starting May 1, 2021. These calculations will be prepared and submitted to EGLE by July 30, 2022, and quarterly thereafter.
Records of each acetone-containing coating and clean-up solvent used and reclaimed, as well as records of acetone emission calculations, for EUCOATING.	PTI No. 119-20 EUCOATING S.C. VI.6	Records of each acetone-containing coating and clean-up solvent used and reclaimed, as well as records of acetone emission calculations have not been maintained since the PTI was issued on April 30, 2021.	Minth has contracted Cornerstone to prepare reports of each acetone-containing coating and clean-up solvent used and reclaimed, as well as records of acetone emission calculations starting May 1, 2021. These calculations will be prepared and submitted to EGLE by July 30, 2022, and quarterly thereafter.
Records of each naphthalene (CAS No. 91-20-3) containing coating usage, as well as naphthalene emission calculations, for EUCOATING.	PTI No. 119-20 EUCOATING S.C. VI.7	Records of each naphthalene (CAS No. 91-20-3) containing coating usage, as well as naphthalene emission calculations have not been maintained since PTI No. 119-20 was issued on April 30, 2021.	Minth has contracted Cornerstone to prepare reports of each naphthalene (CAS No. 91-20-3) containing coating usage, as well as naphthalene emission calculations starting May 1, 2021. These calculations will be prepared and submitted to EGLE by July 30, 2022 and quarterly thereafter.

We appreciate your attention to this matter. If you have questions or comments, do not hesitate to contact me directly at (317) 567-9066 or kgilliam@corner-enviro.com.

Best regards,



Kurt Gilliam
Director of Environmental Services

cc: Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760

Jerry Fitch, Minth

Dawn Bessey, Minth