



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 3, 2020

Mr. John Zanti, Senior Plant Manager  
Plastic Trim International, Inc  
935 Aulerich Road  
East Tawas, Michigan 48730

SRN: N3592, Iosco County

Dear Mr. Zanti:

**VIOLATION NOTICE**

On July 22, 2020, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was investigating an odor complaint concerning Plastic Trim International, Inc located at 935 Aulerich Road, East Tawas, Michigan. While investigating the odor complaint a cursory review of compliance with Permit to Install (PTI) number 305-02 was done. Though the odor could not be confirmed at the time, the following violations of the air permit are cited.

Process Description	Rule/Permit Condition Violated	Comments
FGCOATING – (Paint line)	PTI 305-02 VIII 1	Stack from incinerator is not 1.5 times building height
FGCOATING – (Coex lines)	PTI 305-02 VIII 1	Stacks from coex lines are not 1.5 times building height

Please note the facility record keeping was utilizing purchased volumes minus waste rather than actual usage. Additionally, the destruction efficiency of the paint line incinerator was not being considered. Obviously, the resulting emissions are far less than records indicated. In the absence of the environmental contact, it should be noted ensuing discussions revealed the existing stack heights are the result of proximity to an airport. To rectify the situation, the path forward is felt to be applying for a new site-specific permit for existing stack conditions. If a new permit is granted, it would contain its own special conditions including record keeping requirements.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 24, 2020 (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

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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.

If Plastic Trim International, Inc. 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 violations cited above and for the cooperation that was extended to me during my visit. If you have any questions regarding the violations , please contact me at the number listed below.

Sincerely,



Ben Witkopp  
Environmental Engineer  
Air Quality Division  
989-894-6219

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