



March 6, 2019

Mr. Chris Robinson
Air Quality Division
Michigan Department of Environmental Quality
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, MI 49503-2341

Re: Response to MDEQ Violation Notice, dated February 13, 2019
USM Acquisition, LLC; 7839 Costabella Avenue, Remus, Michigan 49340 (SRN: N5101)

Dear Mr. Robinson

This letter is in response to the MDEQ-AQD Violation Notice (VN) dated February 13, 2019. The referenced VN alleges that USM Acquisition, LLC (USM) did not comply with environmental regulatory requirements and General Conditions in Renewable Operating Permit (ROP) MI-ROP-N5101-2018 as described below:

Process Description	Rule/Permit Condition Allegedly Violated	Comments
<i>Emissions Unit EU-CUTTING, which consists of equipment used to carve, cut and sand resin casts. Particulate matter emissions are controlled by externally vented baghouse.</i>	<i>Rule 370; MI-ROP-N5101-2018 General Condition (GC) No. 9</i>	<i>Improper collection and disposal of an air contaminant.</i>
	<i>Rule 910; MI-ROP-N5101-2018 GC No. 10</i>	<i>Improper operation and maintenance of a control device</i>
	<i>Rule 201</i>	<i>Failure to obtain a permit to install</i>

The VN states that during the inspection large amounts of white particulate matter (PM) were observed on the ground adjacent to the Dust Room and covering the entire surface area of the interior of the Dust Room. Additionally, the VN states that during the MDEQ inspection five open bulk poly bags filled with white baghouse dust were left outside uncovered. The VN also alleges that failure to operate EU-Cutting with an appropriately designed and operated fabric filter... does not allow the use of the Rule 285(2)(l)(vi)(c) exemption...; therefore, USM has installed and commenced operation of an unpermitted process, EU-CUTTING in violation of Rule 201.

USM Response: Following the MDEQ inspection, when the MDEQ noted the open poly bags, USM staff covered the bags with tarps to minimize the reintroduction of dust to the outer air from the bags. We have informed our employees working in the area, that all bags need to be covered and handled in a manner to prevent dust leakage. This source of fugitive dust has now been eliminated.

USM has experienced some difficulty maintaining the fabric filter dust collector associated with EU-Cutting due to the age of the baghouse. Following the inspection, USM also installed new gaskets and added a better closure to the dust room door. USM has received quotes on installing a new baghouse for the system; however, replacing the system does not just entail replacing the baghouse. The entire dust collection system, including all ductwork will need to be replaced, and the new system will also be required to meet OSHA combustible dust requirements. Engineering work must be completed once the new system has been selected and the installation must occur during a plant outage. In addition, a large investment like this must be approved by USM ownership after the system has been selected and installation work identified. As previously indicated, we are receiving quotes for a new dust collection system, these quotes will be presented to ownership by March 15, 2019. We expect that USM owners will decide whether to replace the current system or provide additional investment in the current system by March 29, 2019. Once the final decision has been made to replace or upgrade the dust collection system, USM will follow-up with the MDEQ; as part of that follow-up we will provide a timeline for installation and/or additional maintenance. In the meantime, as previously indicated, new gaskets and a better closer for the Dust Room door have been installed. USM will also increase the baghouse inspection frequency to once per shift and will replace parts as needed.

USM is working diligently to maintain and properly operate the dust collector. We do not believe that we have installed or commenced operation of an unpermitted processes in violation of Rule 201. USM will increase the inspection frequency on the baghouse and will replace parts as needed. The system will be upgraded or replaced, eliminating any future suspicions of improper operation. EU-Cutting will continue to be exempt per the Rule 285 exemption.

In addition, as requested in the VN, a current listing of the materials used in FGPLASTCCOMP and their composition, as required by the source-wide Special Conditions for styrene and volatile organic compound (VOC) emissions. The intent of these conditions is to have enough information to adequately calculate emissions from our permitted processes to ensure compliance with styrene and VOC emission limits.

USM is committed to complying with all applicable regulatory requirements as well as all General and Special Conditions contained in MI-ROP-N5101-2018. This letter should satisfy your request for response to the Violation Notice dated February 13, 2019. If you have any questions regarding these issues, or any others impacting environmental compliance at our facility, please contact me at 989.561.2293 or rfoster@usmarble.com.

Sincerely,



Rick Foster
Vice President
USM Acquisition, LLC

Attachments

By email

cc/att: Jenine Camilleri – MDEQ

Stephanie A. Jarrett, PE – FTCH