



PO971 - RVT - 2017 2127

RECEIVED
MDEQ - JACKSON

SEP 27 2019

AIR QUALITY DIVISION

Name: Daniel Forche
Address: 1549 W. Beecher St.
City: Adrian
ZIP code: 49221

Date: September 25, 2019

Dear Stephanie,

Pursuant to the letters received July 29th 2019 and August 27th 2019 in regards to the violation notice received for lack of permit for current adhesive process I am writing you to address the situation to be applicable to be exempt from a Permit to Install (PTI). I have included in this communication the SDS for said product which is listed as Polyethylene (PE) Resin. The OSHA Hazard classification of this product is listed in Section 1 page 3 the SDS as Combustible Dusts which may form combustible dust in concentrations of air. Please be aware the product is fully contained in a closed system throughout the entire process and is not susceptible to concentrations of air. Also, in section 4 page 5 listing under acute health effects this product are not known to have significant effects on health or critical hazards.

In Section 8 page 7 you will find the exposure limits for Polyethylene (PE) Resin. Also, under section 8 page 8 under the title "Environmental Exposure Controls" that any emissions from ventilation or work process should be checked to ensure they comply with the requirements of environmental protection legislation.

To address the exposure we are required internally to complete Air and Noise assessments every 2 years as a minimum and I have also included the study from this year that shows there are no effects of Carbon Monoxide from the process which is a byproduct of Polyethylene (PE) Resin. With no noticeable fumes in the facility along with the data from the SDS sheet and the Air Study from April of this year we are requesting removal of the violation and an exemption for permit moving forward with the use of this product.

One final item to consider according to the included document we are exempt under R 336.1286 Rule 286 for Plastic Processing Equipment.

Please see the included documents for reference.

Yours faithfully,

Daniel P. Forche

Daniel P. Forche

Environmental, Health and Safety Specialist

Daniel Forche – EHSS
Plastic Omnium
Clean Energy Systems

Address 1549 W. Beecher St Direct : (517)265-1474 / Fax : (517)-265-1126
www.plasticomnium.com

Heading	QMS	Regulatory Citation (Revision Date)	Regulatory Description / Requirement	Related Documents (Internal auditor reference)	In Compliance? YES / NO / NA	Finding Description / Comments / Applicability Reasoning	Action Ranking (High, Medium, Low, BMP)	Recommended Corrective / Preventive Action
Permit to Install	2.4.6	R 338.1280 - R 338.1289 (2016)	Permit to install requirement is exempted by source category as provided in R 338.1280 - R 33.1290. These specific categories include: *Rule 280- Cooling and Ventilating Equipment *Rule 281- Cleaning, Washing, and Drying Equipment *Rule 282- Furnaces, Ovens, and Heaters *Rule 283- Testing and Inspection Equipment *Rule 284- Containers *Rule 285- Miscellaneous *Rule 286- Plastic Processing Equipment *Rule 287- Surface Coating Equipment *Rule 288- Oil and Gas Processing Equipment *Rule 289- Asphalt and Concrete Production Equipment	*PII exemption support, calculations, installation dates	Yes	The facility processes include plastic blow molding equipment only, therefore exemption Rule 286 applies.		