



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SAGINAW BAY DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

December 5, 2017

Mr. John Schmitzer, Engineering Manager
U S Graphite Inc
1620 East Holland Avenue
Saginaw, Michigan 48601

SRN: B1995, Saginaw County

Dear Mr. Schmitzer:

VIOLATION NOTICE

On December 1, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of U S Graphite Inc located at 1620 East Holland Avenue, Saginaw, Michigan. The purpose of this inspection was to determine U S Graphite Inc's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 230-07.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUGRAPHITEKILN	S.C. 1.4 Afterburner temperature of 1400°F required	Records from August, September, October, and November 2017 show the afterburner only reaches a max temperature of <700
EUGRAPHITEKILN	R910 Afterburner malfunctioning while in operation	During site visit visually observed "low temp" alarm.

On December 1, 2017, the AQD staff observed operation of the graphite kiln in operation while the secondary chamber or afterburner was malfunctioning/off line/ inoperable.

This constitutes a violation of Act 451, Rule 910, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 26, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the

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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 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 U S Graphite 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 inspection of U S Graphite Inc. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Gina L. McCann
Senior Environmental Quality Analyst
Air Quality Division
989-439-2282

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Chris Hare, DEQ