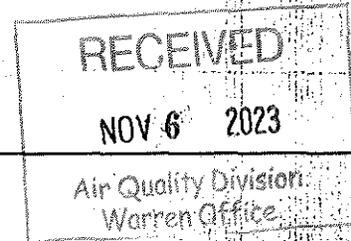


The **Korex** Corporation

50000 Pontiac Trail, Wixom, MI 48393
 Telephone: (248) 624-0000 | Fax: (248) 624-0506



In response to VN 9-29-2023 cited below for the Korex Corporation located at 50000 Pontiac Trail, Wixom MI, 48393.

On August 3, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Korex Corporation located at 50000 Pontiac Trail, Wixom, Michigan. The purpose of this inspection was to determine Korex'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 539-96.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Contract powdered detergent manufacturing	Michigan Administrative Rule 201	The facility operates a powder packing line (Line 4) without a permit to install.
Contract powdered detergent manufacturing	PTI 539-96 Special Condition 2	The facility has not maintained PM calculations—lb/hr, 12-month rolling for bulk unload.
Contract powdered detergent manufacturing	PTI 539-96 Special Condition 8	The facility does not maintain records of monthly operating hours based on a 12-month rolling average.
Contract powdered detergent manufacturing	PTI 539-96 Special Condition 9	The facility has not implemented the preventative maintenance plan attached in the permit and does not keep maintenance logs.
Contract powdered detergent manufacturing	PTI 539-96 Special Condition 10	NOx and CO emissions calculations are inaccurate.

Wixom Plant

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Violation: The facility operates a powder packing line (Line 4) without a permit to install.

Response: Though Korex has worked with EGLE representatives to correct this previously; a key piece of information could not be obtained by the manufacturer of one of the raw materials used on this production line leaving a gap in the documentation needed to retroactively obtain the permit and integrate with a revised version of Korex's operations permit. However, by November 30th 2023 this packing line will no longer be operational with no plans currently of future production. At that time there will be no potential for emissions and this packing line will not be within the scope of the Korex permit. Due to difficulties in obtaining information and the planned shutdown of this line Korex feels that the operations will end prior to getting a revised permit in place. Korex plans to run the remainder of production then allow the line to become obsolete in our operations. Korex will continue to work with EGLE representatives on this item should they be necessary.

Violation: The facility has not maintained PM calculations—lb/hr, 12-month rolling for bulk unload.

Response: Korex can and has retro calculated this for 12 month blocks instead of a rolling 12-month total. Calculation can be broken down by month and move to a 12-month rolling moving forward.

Violation: The facility does not maintain records of monthly operating hours based on a 12-month rolling average.

Response: This was inadvertently removed in the re-creation of the Korex tracker and will be added back in moving forward.

Violation: The facility has not implemented the preventative maintenance plan attached in the permit and does not keep maintenance logs.

Response: Korex acknowledges the deficiencies with the logging of these checks within the maintenance department. As such the responsibility will be shifted to where QA will conduct and record these checks directly reporting to the QA Manger on the matter.

Violation: NOx and CO emissions calculations are inaccurate.

Response: Korex is working with EGLE representative to correct this issue for the next reporting cycle for accuracy.

 *Callin Pemberton* QA Manager

Wixom Plant