

August 22, 2022

Mr. Michael Cox
Environmental Quality Analyst
Air Quality Division
Grand Rapids District
350 Ottawa Ave. NW
Unit 10
Grand Rapids, MI 49509

NBHX Trim USA
1020 7 Mile Road
Comstock Park, MI 49321



RE: RTO Test - Violation Notice Response for SRN N2614 - NBHX Trim USA

Dear Mr. Cox:

This letter is in response to the Violation Notice received from you on August 19, 2022 regarding the failed destruction efficiency (DE) portion of the RTO emission compliance test conducted on August 9 & 10, 2022.

The exact cause of the failed test has not been determined yet but we believe it to be related to the damper mechanism that directs exhaust flow to bed 1 or bed 2 of the RTO. Based on raw data observed while testing was being done, it appears there is a very small leak of exhaust that occurs only when the damper has switched to bed 2. This small amount was enough to bring our overall destruction efficiency below our permit limit. While we don't have the final test report yet, based on what was observed, we feel the DE was in the percent range of low 90's or high 80's which would be below our permit limit of 95%. We expect to receive the final test report in the next 7-10 days.

The plan to resolve this problem will be the following:

1. Get into RTO and evaluate damper for damage or sealing deficiencies that could be causing leak;
2. Attempt to fix identified problems immediately. If problem is not able to be fixed by plant maintenance, then a contractor will need to be scheduled to do the repair. This would be the case if the damper itself is cracked or bent;
3. Re-evaluate damper for improvement through post repair inspection upon completion of repair;
4. Re-schedule stack test.

To do the inspection the RTO needs to cool down for 24-36 hours before it can be entered. Therefore, we have scheduled this to be done on September 5, 2022 which is the Labor Day holiday. Once the inspection is completed, we will be able to update you on what the timing of the next steps will be.

In regard to the plant closing down, 60 day WARN notices were given to employees on Friday August 12, 2022 informing them that production would cease at the middle to end of October 2022 as the business will be moved to Mexico. However, they did say that if the transition of production from this facility to Mexico was delayed, production may extend to the end of 2022. Currently though, Senior Management from China is pushing for the end of October.

If you have questions and would like to discuss our plan further, please don't hesitate to contact me at your convenience.

Sincerely



Dan Madden

Plant Engineer/Facilities & Maintenance Manager,
Environmental, Health & Safety Compliance

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Cc: Ms. Jenine Camilleri EGLE