



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

June 29, 2022

Dan Madden
NBHX Trim USA Corporation
1020 Seven Mile Road
Comstock Park, Michigan 49321

SRN: N2614, Kent County

Dear Dan Madden:

VIOLATION NOTICE

On June 28, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed a stack test of the regenerative thermal oxidizer to determine the volatile organic compound destruction efficiency at NBHX Trim USA Corporation located at 1020 Seven Mile Road, Comstock Park, Michigan. The purpose of the stack test was to determine NBHX Trim USA Corporation'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 Renewable Operating Permit (ROP) number MI-ROP-N2614-2017a.

During the stack test, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Regenerative Thermal Oxidizer controlling EUPOLYU and EUPOLYESTER-A	MI-ROP-N2614-2017a, FGRT0, SC III.4	Testing terminated on June 28, 2022 due to RTO's failure to meet the minimum 95% destruction efficiency prior to starting test runs.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 20, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Dan Madden
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Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If NBHX Trim USA Corporation 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 violation cited above and for the cooperation that was extended to me during my stack test observation at NBHX Trim USA Corporation. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Michael Cox
Environmental Quality Analyst
Air Quality Division
616-240-3607

cc: Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Heidi Hollenbach, EGLE
Lindsey Wells, EGLE