



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 15, 2022

Gloria Webber, General Manager
Temperform, LLC
25425 Trans-X Road
Novi, Michigan 49375

SRN: B7357, Oakland County

Dear Gloria Webber:

VIOLATION NOTICE

On August 4, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Temperform, LLC located at 25425 Trans-X Road, Novi, Michigan. The purpose of this inspection was to determine Temperform, LLC'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 60-00C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBAGHOUSE3	PTI No. 60-00C Special Condition IV.4. Rule 910 (R 336.1910)	Failure to maintain a minimum afterburner temperature of 1350 degrees F while processing sand in the thermal reclamation unit.
FGSCRUBBERS1/2	PTI No. 60-00C Special Condition III.2. Rule 910 (R 336.1910)	Operation of emission units associated with FGSCRUBBERS1/2, while one or both of the scrubbers were not operating.
FGSCRUBBERS1/2	PTI No. 60-00C Special Condition IV.1. Rule 910 (R 336.1910)	Failure to install and operate liquid flow monitoring devices for each scrubber to record the flow rates of effluent, make-up, and recirculation water on an hourly basis.

Process Description	Rule/Permit Condition Violated	Comments
FGSCRUBBERS1/2	PTI No. 60-00C Special Condition IV.2. Rule 910 (R 335.1910)	Failure to install and operate pressure drop monitoring devices to record pressure drop for each scrubber on a continuous basis.
FGMACTZZZZZ Steel Foundry	40 CFR Part 63, Subpart ZZZZZ, Iron and Steel Foundries Area Sources NESHAP (63.10899(c))	Failure to submit semiannual compliance reports for the time period of January 1, 2020, through July 1, 2022.

On August 4, 2022, AQD staff observed the operation of processes associated with FGSCRUBBERS1/2, including mold and core preparation, melting, pouring, and cooling, while Scrubber No. 1 and Scrubber No. 2 were not operating. Additionally, on August 30, 2022, Temperform, LLC provided records documenting that the facility operated FGSCRUBBERS1/2 while Scrubber No. 1 and Scrubber No. 2 were not operational and being repaired on the following dates: August 8, 2022, August 9, 2022, August 10, 2022, August 11, 2022, August 15, 2022, August 16, 2022, August 17, 2022, August 22, 2022, and August 23, 2022. Operation of FGSCRUBBERS1/2 while Scrubber No. 1 and Scrubber No. 2 are not operating constitutes a violation of Rule 910 and requirements of PTI No. 60-00C.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 6, 2022, which coincides with 21 calendar days from the date of this letter). The written response should include: the 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.

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, as well as to Joyce Zhu, Warren District Supervisor at EGLE, AQD, 27700 Donald Court, Warren, Michigan 48092.

If Temperform, LLC 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.

The AQD is also requesting that Temperform, LLC prepare and submit a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at <https://www.michigan.gov/egle/about/organization/air-quality>. Choose the "Permits"

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Tab, then "Air Permitting-Potential to Emit" under the Permits to Install (PTI)/ New Source Review (NSR) Heading. Please provide the PTE demonstration by October 31, 2022.

Additionally, AQD is requesting that Temperform, LLC conduct air emissions performance testing on each of the wet scrubbers that control emissions from FGSCRUBBERS1/2. In accordance with Rule 1001 (R336.2001), General Condition 13, and Special Condition FGSCRUBBERS1/2 V.1. of Permit to Install No. 60-00C, the AQD is requesting that Temperform, LLC submit a test protocol within 60 days of receipt of this letter. The protocol shall include a proposed date for the testing, which is to be conducted no later than March 14, 2023. The test should determine the emission rate of VOC, PM, PM10, PM2.5., as well as the metal HAPs: antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, and selenium from the wet scrubbers. All testing must be conducted using United States Environmental Protection Agency approved test methods.

Not less than 7 days before the performance test is conducted, the AQD must be notified in writing of the time and place of the performance tests and who shall conduct them. Results of the performance test shall be submitted to the department in the format prescribed by the applicable reference test method within 60 days after the last date of the test.

Copies of the test plan should be sent to the Department of Environment, Great Lakes, and Energy, Air Quality Division Technical Programs Unit at P.O. Box 30260, Lansing, Michigan 48909-7760 and the Grand Rapids District Office at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503. Performance testing will determine the emission rate of VOC, PM, PM10, PM2.5., as well as the metal HAPs: antimony, arsenic, beryllium, cadmium, chromium, cobalt, lead, manganese, mercury, nickel, and selenium. All testing must be conducted using United States Environmental Protection Agency approved test methods.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Temperform, LLC. 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,



Eric Grinstern
Environmental Quality Specialist
Air Quality Division
616-558-0616

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE