

To: Owen Pierce
 Environmental Engineer
 EGLE, AQD Warren District
 27700 Donald Court, Warren, MI 48092-2793

From: Lucas Rago – EHS Manager MML

Date: September 5, 2024

Re: Madison Heights Violation Notice – August 9, 2024

Mr. Pierce,

This letter (the “Letter”) is in response to the Violation Notice dated August 9, 2024, to Mold-Masters Limited (“Mold-Masters”) regarding a site inspection on June 20, 2024 for the site located at 29111 Stephenson Highway. Note that while the Violation Notice was dated August 9, 2024, the Site Representative received the written notice on September 4, 2024, and notified the Inspector that same day.

The Mold-Masters’ team has provided corrective actions to the identified concerns as follows:

Process Description:	Permit Condition Violated:	Inspector Comments:	Mold-Masters Comments / Corrective Actions:
EUFLUIDCLEAN	PTI No.99-15B, Special Conditions VI.3 & VI.7	The Permittee failed to provide the time, date, duration, sand bed temperatures and exhaust air flow temperatures for each batch of materials processed on a calendar day basis for the entirety of the requested time period of September 2023 to May 2024. Only temperature records from April 2024 through May 2024 were sent to AQD staff.	The Mold-Masters’ team discovered that while the data is now being collected, the oven unexpectedly halted logging it’s data. Internal IT and external contractors were brought in to resolve the technical issue and the system has been recording the required data since April 17, 2024. The log will be provided as evidence of correction along with this Letter, if requested.
EUMINICLEAN	PTI No.99-15B, Special Conditions II.2, II.3, IV.1, VI.1, VI.3 & VI.4	The permittee failed to provide temperature data records for the afterburner chamber, records for the hours of operation of the emission unit on a monthly basis and on a 12-month rolling time period as determined at the end of each month and failed to operate the afterburner chamber at the minimum temperature of 1560°F (849°C) for the requested time period of September 2023 to May 2024.	During the site visit, the Inspector suggested the use of a Manual Log due to the infrequency of use of the oven. In accordance with the suggestion, the Log was created and shared with the Inspector via email and is being completed when the Oven is to be used. The runtime and temperature criteria are recorded on this Log as well. Additionally, the minimum temperature on the afterburner has been adjusted to meet the 1560°F (849°C) criteria.

Given the Corrective Actions above, Mold-Masters’ believes it has met the requirements to resolve the Violation Notice and prevent reoccurrence. If you have any questions regarding the resolutions, please let us know,

Sincerely,

Lucas Rago
 Lucas Rago
 EHS Manager – MML

CC: John Turnbull - Manager MMI Repairs & Service
 Andrew Small – Director Global Operations MML
 Jenine Camilleri – Enforcement Unit Supervisor, EGLE, AQD