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 MAR 25 2022  
 Air Quality Division  
 MD

March 24, 2022

Ms. Joyce Zhu  
 Michigan Department of Environment, Great Lakes and Energy (EGLE)  
 27770 Donald Court  
 Warren, MI 48092

Subject: General Motors – Warren Tech Center  
 Response to Violation Notice dated March 16, 2022

Dear Ms. Zhu:

The following is in response to the Violation Notice received by General Motors LLC (GM) from the Michigan Department of Environment, Great Lakes and Energy (EGLE) on March 16, 2022. The Notice requires GM to provide a written response to EGLE by April 6, 2022, which shall 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".

On February 22, 2022, GM received notification from EGLE of a fallout complaint at the PPO South facility from a computer numeric control (CNC) mill Styrofoam collection system. Upon review, it has been determined that the system experienced two failures. On January 31, 2022, a compactor malfunction caused a collection system backup, where foam escaped from the process. The system was taken offline that day for repairs and cleaning. On February 21, 2022, the system was restarted. A filter failure in the collection system occurred, allowing some foam to escape. On the afternoon of February 22, 2022, the system was shut down for repairs.

GM takes its environmental responsibilities seriously and in response to the event has undertaken the following actions:

**Plan of Action – Styrofoam Release**

No.	Action Item	Date	Status
1	Storm sewer inlet filters installed. Streetsweeper and housekeeping measures initiated for cleanup of shavings. Periodic inspections will continue, and additional shavings will be collected as needed.	2/22/2022	Ongoing as needed
2	Repair of the malfunction in the Torit filter cleaning circuit to improve cycling of the cleaning mode while unit is running. Repairs and adjustment of the compressed air feed for improved cartridge cleaning.	2/28/2022	Completed
3	Interlock the CNC machine to dust collector, to auto start the Torit filter with the CNC mill when running.	3/5/2022	Completed
4	Repair collection box system leaks. Install gaskets around inspection doors on the compactor box.	3/15/2022	Completed
5	After further review of the process, it has been determined to permanently shut down the CNC mill for Styrofoam.	3/17/2022	Completed



Based on the above actions, the matter has been resolved and there is no risk of reoccurrence. In addition, all other equipment applicable to FG-WOODMETAL (MISCR336.1331) or other appropriate emission groups will be included in the ROP during the next renewal cycle, as required.

If you have any additional questions, please contact Scott Applegate, Environmental Supervisor at (248) 494-6643 or [Scott.Applegate@gm.com](mailto:Scott.Applegate@gm.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Amanda Allen', with a long horizontal flourish extending to the right.

Amanda Allen  
Senior Manager  
General Motors - Warren Tech Center

Cc:

Ms. Jenine Camilleri, EGLE  
Mr. Iranna Konanahalli, EGLE