



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

March 16, 2022

VIA E-MAIL AND U.S. MAIL

Ms. Amanda Allen  
Senior Manager, Sustainable Workplaces  
General Motors LLC  
Global Technical Center  
31295 Charles Kettering  
MC 480-101-240  
Warren, Michigan 48090

SRN: B4049, Macomb County

Dear Ms. Allen:

**VIOLATION NOTICE**

On March 2 and 11, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of General Motors LLC, Global Technical Center (GM Tech Center), located at 31295 Charles Kettering, Warren, Michigan. The purpose of this inspection was to determine GM Tech Center'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

1. The conditions of Renewable Operating Permit (ROP) number MI-ROP-B4049-2019a as ammended on February 24, 2022.
2. To investigate a recent complaint received on March 1, 2022. The incident occurred on February 22, 2022 in PPO South Building 18, DOC 12, south of 12 Mile Road, regarding Styrofoam particulate matter fallout allegedly from GM Tech Center PPO operations.

During the March 2 and 11, 2022 inspection, the AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
One CNC machine, for making Styrofoam templates for molding, equipped with a particulate matter control system, a cartridge filter system with 48 cartridges.	Michigan Administrative Code Rule 336.1910	GM Tech Center failed to install, maintain, and operate in a satisfactory manner and in accordance with the rules and existing law an air-cleaning device. GM Tech Center failed to operate properly the cartridge filter system

		for the Styrofoam CNC machine. This failure resulted in substantial Styrofoam particles fallout in South PPO area (DOC 12, Building 18).
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During the FY 2022 inspection/complaint investigation, the AQD staff reviewed the operation of CNC machine and associated cartridge filter system. Failure of the particulate matter control system, specifically cartridge filter system, resulted in fallout of Styrofoam particles on the roof, the parking lots and the stormwater collection systems. On March 11, 2022, after initial cleanup, there were still noticeable Styrofoam particles on the parking lot. This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

The definition of “major stationary source” requires a tripartite test for determining the geographic extent of a single source. Specifically, a major stationary source is defined as all of the pollutant emitting activities that are (1) located on one or more contiguous or adjacent properties; (2) are under common control of the same person (or persons under common control); and (3) belong to a single major industrial grouping or are supporting the major industrial group (as determined by the Major Group codes in the Standard Industrial Classification Manual). Hence, the PPO operation southside of 12 Mile Road is part of the stationary source (GM Tech Center); and the applicable processes should be included in the ROP. Please include the Styrofoam CNC machine, and any other process equipment on southside of 12 Mile Road that has an applicable requirement (such as Rule 331), into MI-ROP-B4049-2019a, FG-WOODMETAL (MISC-R336.1331) or other appropriate emission group of the ROP.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by **April 6, 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If GM Tech Center 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.

Ms. Amanda Allen  
General Motors LLC  
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Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of GM Tech Center. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the e-mail address below.

Sincerely,



Iranna Konanahalli  
Senior Environmental Engineer  
Air Quality Division  
[konanahalli@michigan.gov](mailto:konanahalli@michigan.gov)

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Joyce Zhu, EGLE  
Mr. Eric Moore, EGLE  
Ms. Caryn Owens, EGLE  
Ms. Kerry Kelly, EGLE  
Mr. Jeff Rathbun, EGLE  
Mr. Mark Dziadosz, EGLE  
Mr. Scott Applegate, GM  
Ms. Marianne Secrest, GM  
Ms. Rachel Gribas, GM  
Ms. Jessica Alderton, GM