

# TEMPERFORM

April 28, 2023

Mr. Iranna Konanahalli, Senior Environmental Engineer  
**State of Michigan Department of Environment, Great Lakes, and Energy**  
Warren District Office – Air Quality Division  
27700 Donald Court  
Warren, MI 48092

**SRN: B7357, Oakland County**  
**Violation Notice: April 18, 2023**

Dear Mr. Konanahalli:

On April 12, 2023, you, on behalf of the Michigan Department of Environment, Great Lakes, and Energy – Air Quality Division, conducted an inspection of Temperform, LLC located at 25425 Trans-X Road, Novi, to determine compliance with federal and state air pollution regulations. Temperform received a Violation Notice (VN) resulting from that inspection on April 18, 2023. The VN cites an alleged Rule/Permit Condition Violation related to FG-SCRUBBERS1/2 (PTI No. 60-00C, FG-SCRUBBERS1/2, III.2, 3; Michigan Administrative Code R 336.1910 – Air-cleaning devices).

While on-site for one hour (1:30 pm – 2:30 pm), you observed that the furnaces, melting, pouring, sand processing, etc. were operating while the two corresponding scrubbers were shut down. This observation caused you to conclude that detectable odor was due to uncontrolled emissions. The company offers the following explanation of the circumstances you observed.

Temperform is making upgrades and design improvements to the FG-SCRUBBER1/2 emission control system. In July, Temperform plans to install a new scrubber system, and currently, the company is working on building a new water holding tank to replace aging equipment.

On April 12, 2023, at approximately 11:30 am, the maintenance team and the in-house welder turned off the water circulation portion of the system to take measurements for building the new water holding tank. After completing this task, the water circulation system was inadvertently left off until it was restored to service during the inspection at approximately 2:20 pm.

During this three-hour window, it was 79 degrees, and the wind was blowing at 17 mph out of the east. Documentation kept by the company correlates odor complaints with strong easterly winds.

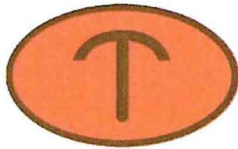
When the water portion of the system was turned on, a PVC pipe for the system came loose at the elbow joint. The PVC pipe was put back in place and re-glued immediately. This repair restored system integrity and proper mechanical performance. The scrubbers were in mechanical condition to operate.

Going forward, two corrective actions have been implemented to prevent a recurrence of this incident. They are:

1. The ability to turn on or off the scrubber system has been locked in the computerized maintenance management system. Only the maintenance supervisor and his assistant can turn on or off the scrubber system. Both individuals understand the specific requirements and procedures involved in control equipment operation and maintenance.
2. As a secondary measure, a visual alarm system was installed this week. The visual alarm is an outdoor green- or red-light system. A green light indicates that all components of the scrubber system are on and operating correctly. A red light indicates that the scrubber system is not operating correctly, and the appropriate malfunction abatement procedures should be followed. All facility staff will be instructed that if the visual alarm light is red, maintenance and/or management must be notified immediately.

In conclusion, Temperform wishes to reiterate that the company recognizes its responsibility to operate within the requirements of its air permit and is committed to compliance. The corrective measures promptly put in place should prevent a repeat of this incident.

Respectfully,



**Gloria Webber**  
Site Manager  
Temperform, LLC



248-982-7436  
[gloria@temperform.com](mailto:gloria@temperform.com)  
[temperform.com](http://temperform.com)  
25425 Trans X Rd, Novi, MI 48375

Cc: Alex Lawton, CEO-The Lawton Standard Co.  
Blake Albritton, CTO-The Lawton Standard Co.  
Jenine Camilleri, Enforcement Supervisor, EGLE