

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

March 17, 2017

Mr. Bruce Boettger, President Temperform, LLC P.O. Box 767 Novi, MI 48376-0767

SRN: B7357, Oakland County

Dear Mr. Boettger:

VIOLATION NOTICE

On March 2, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Temperform, LLC (Temperform) located at 25425 Trans X Road, Novi, Michigan. The purpose of this inspection was to determine Temperform'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 to investigate a recent complaint which we received on February 24, 2017, regarding metallic odors in the area.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGSCRUBBERS1/2: Two scrubbers controlling emissions from melting, mold pouring, and cooling operations.	PTI No. 60-00B, FGSCRUBBERS1/2 Special Condition 4.3; Rule 910.	Scrubber flow rate is below manufacturer's recommended flow rate. Manufacturer's recommended flow rate is between 275 and 475 gallons water per minute (GPM). From observing digital meters, EUSCRUBBER1 had a flow rate of 203 GPM, and 215 GPM when observing the meter several minutes later. EUSCRUBBER2 had flow rates of 150 GPM and 147 GPM at two observations of the meter while I was on site.

On March 2, 2017, the AQD staff observed that the flow rate of water through the two scrubbers on site was below manufacturer's specifications.

Mr. Bruce Boettaer Page 2 March 17, 2017

This constitutes a violation of Act 451, Rule 910, 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.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 7, 2017 (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.

If Temperform 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.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Temperform. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Sam Liveson **Environmental Engineer** Air Quality Division 586-753-3749 or livesons1@michigan.gov

cc/via e-mail: Mr. Dan Bickersteth, Temperform Mr. Nick Riccobono, Temperform Ms. Lynn Fiedler, DEQ Ms. Mary Ann Dolehanty, DEQ Mr. Chris Ethridae, DEQ Mr. Thomas Hess, DEQ Ms. Joyce Zhu, DEQ

1