

GRETCHEN WHITMER GOVERNOR STATE OF MICHIGAN

DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



LIESL EICHLER CLARK DIRECTOR

May 21, 2019

Mr. Blake Albritton Director of Engineering and Quality Assurance Temperform 25425 Trans X Road Novi, MI 48375

SRN: B7357, Oakland County

Dear Mr. Albritton:

VIOLATION NOTICE

On April 25, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of 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; the conditions of Permit to Install (PTI) number 60-00B; and to investigate recent complaints which we received between April 12-23, 2019, regarding foul odors attributed to foundry operation.

During the inspection, staff observed the following:

	Rule/Permit	
Process Description	Condition Violated	Comments
Mold/Core preparation,	PTI 60-00B, General Condition 6.	A distinct and definite
pouring and cooling		objectionable odor
operations, sand	R.336.1901 (Rule 901) Air	originating from the site was
reclamation.	contaminant prohibition.	detected downwind of the
		facility.
EU-Scrubber #1	PTI 60-00B, Special Condition 4.3.	Scrubber #1 was not
		operating constantly
	Special Condition 5.3 Malfunction	between 275 – 425 gpm per
	Abatement Plan.	the manufacturer's
		specifications and the
	R.336.1910 (Rule 910) Air	facility's Malfunction
	Cleaning Devices.	Abatement Plan.
EU-Scrubber #2	R.336.1910 (Rule 910) Air	Scrubber #2 has not been
	Cleaning Devices.	operating while the process
		is operating.
EU-Baghouse #1	PIT 60-00B, Special Condition 1.2.	Static pressure drop
		monitoring device was not
	R.336.1910 (Rule 910) Air	operating in a satisfactory
	Cleaning Devices.	manner.

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In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451 (and General Condition 6 of PTI number 60-00B). The AQD staff detected the odor downwind of the facility matching the odor on site of the facility.

On April 25, 2019, the AQD staff observed operation of mold/core preparation while scrubber #2 was offline, and the static pressure drop monitoring device of baghouse #1 was malfunctioning. This constitutes three (3) violations 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 rules and existing law.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 11, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 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 April 25, 2019. 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, -Robert Joseph

Robert Joseph Environmental Engineer Air Quality Division 586-506-9564

cc: Ms. Mary Ann Dolehanty, EGLE Dr. Eduardo Olaguer, EGLE Ms. Jenine Camilleri, EGLE Mr. Christopher Ethridge, EGLE Ms. Joyce Zhu, EGLE