



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

April 18, 2023

Alex Lawton, CEO
The Lawton Standard Company
1950 Enterprise Drive
De Pere, Wisconsin 54115

Blake Albritton
Chief Technology Officer
Temperform, LLC
25425 Trans-X Road
Novi, Michigan 48375

SRN: B7357, Oakland County

Dear Alex Lawton and Blake Albritton:

VIOLATION NOTICE

On April 12, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Temperform, LLC 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 the conditions of Permit to Install (PTI) number 60-00C dated April 27, 2022.

During the April 12, 2023, inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
PTI No. 60-00C, FG-SCRUBBERS1/2 (EU-SCRUBBER1 and EU-SCRUBBER2) Melting, pouring, cooling of metal and mold/core preparation operations controlled by two 40,000 CFM wet scrubbers (with random packing and a liquid phase carbon adsorption system) that are arranged in parallel. Small Area Source Foundry NESHAP / MACT 5Z	PTI No. 60-00C, FG-SCRUBBERS1/2, III.2, 3 Michigan Admin. Code R 336.1910 - Air-cleaning devices	The FG-SCRUBBERS1/2 process units (furnaces, melting, pouring, sand processing, etc.) were operating while two corresponding scrubbers were shutdown. ^β

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^β It was observed intermittent, clearly detectable odor at Trans-X and Pennsylvania Avenue (April 12, 2023, 1:30 through 2:30 p.m.), Novi. Upon arriving at Temperform, almost all process units except one (sand burn-off oven with an afterburner stopped operating about 1 p.m.) were operating while two corresponding plant emissions control system scrubbers were shutdown. The scrubbers' non-operational status was indicated by absence of flow at the recirculating tank; and the control panel was turned off. Evidently, the odors were due to uncontrolled plant emissions. Please be advised that PTI No. 60-00C prohibits operating any emission unit without properly simultaneously operating the two parallel scrubbers.

When the scrubbers were started (by Dan Young), contaminated water spilled rapidly from a broken pipe at the roof level. Also, scrubber liquor water was sprayed on the nearby personnel forming black stains on clothing. Based on these observations, the parallel scrubbers were not in a mechanical condition to operate.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **May 16, 2023** (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 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 violations cited above and for the cooperation that was extended to me during my inspection. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
Konanahalli@Michigan.Gov

cc: Gloria Webber, Temperform
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE