



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 17, 2021

Mr. Hugo Leonardi
NBHX Trim USA Corporation
1020 7 Mile Road
P.O. Box 368
Comstock Park, MI 49321

SRN: N2614, Kent County

Dear Mr. Leonardi:

VIOLATION NOTICE

On July 16, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of NBHX Trim USA Corporation located at 1020 7-Mile Road, Comstock Park, Michigan. The purpose of this inspection was to determine NBHX Trim USA Corporation'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 Renewable Operating Permit (ROP) number MI-ROP-N2614-2017a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGDUST	ROP No. MI-ROP-N2614-2017a, FGDUST, Special Condition III. 1 Rule 910	Failure to maintain required pressure drops of dust collectors.
FGDUST	ROP No. MI-ROP-N2614-2017a, FGDUST, Special Condition VI.7	Failure to restore proper operation of dust collectors per CAM requirements.

The AQD staff observed records for FGDUST that indicate four out of the five dust collectors did not maintain the required pressure drop range of 1 -5 inches of water throughout the time period of January 1, 2020 through July 16, 2021 as outlined in Special Conditions VI.1. and VI.3 and the Compliance Assurance Monitoring (CAM) plan. Special Condition VI. 7. states in part...

Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the dust collectors to their normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions...

Based on the number of excursions and exceedances noted in the records review, NBHX Trim USA Corporation failed to restore the operation of the dust collectors to normal or usual operations in an expeditious manner as outlined by Special Condition VI.7. above.

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In addition, the records show the dust collectors were not operating properly for the time period of January 1, 2020 through July 16, 2021. This constitutes a violation of ROP No. MI-ROP-N2614-2017a, FGDUST, Special Condition III.1 and 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.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 8, 2021 (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, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If NBHX Trim USA Corporation 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 NBHX Trim USA Corporation. 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,



Michael Cox
Environmental Quality Analyst
Air Quality Division
616-240-3607

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