



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

April 25, 2023

VIA E-MAIL AND U.S. MAIL

Ted Howard, Plant Manager
Depor Industries
1902 Northwood
Troy, Michigan 48084

SRN: N7599, Oakland County

Dear Ted Howard:

VIOLATION NOTICE

On March 22, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Depor Industries located at 1902 Northwood, Troy, Michigan. The purpose of this inspection was to determine Depor Industries' 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 489-99F.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-BURNOFF	PTI 489-99F Special Condition IV.1, VI.1 and VI.3	Depor Industries failed to maintain temperature data records in a satisfactory manner. A single paper chart was used for recording temperatures for the burnoff oven for multiple weeks from December 2022 to March 2023. Additionally, during the inspection the burnoff oven was observed operating within a temperature range of 1350°F-1370°F, below the minimum temperature of 1400°F, and according to maintenance staff at the facility, this had been a common occurrence.

Ted Howard
Depor Industries
Page 2
April 25, 2023

During this inspection, Depor Industries was unable to produce the requested temperature data records in a satisfactory manner and was observed operating the EU-BURNOFF at temperatures below the minimum temperature of 1400°F. This is a violation of the design/equipment and monitoring/recordkeeping limitations specified in Special Conditions (SC) IV.1, SC VI.1 and SC VI.3 of PTI number 489-99F.

The conditions of PTI number 489-99F require satisfactory operation of the EUBURNOFF by maintaining a minimum temperature of 1400°F, and require temperature data records for the secondary chamber, or afterburner portion of the EUBURNOFF, to be recorded at least once every 15 minutes and be kept in a satisfactory manner, in a format acceptable to the AQD Supervisor, and made available to the Department upon request.

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 Depor Industries 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 of Depor Industries. 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,



Owen Pierce
Environmental Engineer
Air Quality Division
586-854-3244

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