



May 18, 2021

Mr. Sam Liveson
Environmental Engineer
EGLE Air Quality Division
3058 W. Grand Blvd.
Suite 2-300
Detroit, MI 48202

Dear Mr. Liveson:

In response to the violation notice letter dated April 29, 2021, we are submitting the following response to the alleged nuisance odor complaint which was received on April 19, 2021.

On April 19, 2021, the Quaker Houghton manufacturing facility located at 9100 Freeland St. in Detroit, Michigan was producing a chemical product which contains raw materials that potentially generate odors during the production process, which takes about 8-12 hours to complete. The chemical product in question is usually manufactured every 30 to 60 days in a bulk mixing tank, which is equipped with an odor suppression system. It is not uncommon for odors to be generated when producing this product, however, complaints occur depending on the wind direction and the effectiveness of our odor suppression system. As you can tell from the lack of complaints generally, our odor suppression system is effective and mitigates discomfort for nearby residents and places us in compliance with nuisance odor laws.

Quaker Houghton is in the process of determining if a failure might have occurred which gave rise to this nuisance odor complaint. If so, Quaker Houghton may look into substitute raw materials which could be used in this formulation and would reduce the odors being generated during the production process. We are also re-evaluating our current odor suppression system to see if it is operating as designed.

If material substitution is not feasible and it is determined that our current odor suppression unit is not capable of suppressing the nuisance odors in question, Quaker Houghton will investigate other potential options in order to mitigate the potential nuisance odors. We expect to complete the evaluation of raw material substitution and odor suppression system effectiveness by June 30, 2021.

Quaker Houghton is committed to work with the EGLE Air Quality Division to resolve this issue.

Feel free to contact us if you have any questions about the progress of these activities.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Scott Mendelson'.

Scott Mendelson
EHS NA Manufacturing

Cc: Jenine Camilleri

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