



UPS Tracking No.: 1Z82F3F50390673680

August 9, 2021

Mr. Mike Kovalchick
Senior Environmental Engineer
EGLE – Air Quality Division
301 East Louis B. Glick Highway
Jackson, MI 49201

Subject: Response to July 20, 2021 Violation Notice
Martinrea Industries, Inc. – Bishop Circle Assembly
State Registration Number B3658

Dear Mr. Kovalchick;

On behalf of our client, Martinrea Industries, Inc. (Martinrea), Impact Compliance and Testing, Inc. (ICT) is submitting this response to the Violation Notice dated July 20, 2021 for the Martinrea Bishop Circle Assembly (BCA) facility located in Manchester, Washtenaw County, Michigan. The Michigan Department of Environment, Great Lakes and Energy (EGLE) requested a response by August 10, 2021. This document was prepared under the direction and approval of Mr. Michael Zobel, BCA EHS Manager.

Earlier this year, BCA submitted to EGLE a Permit to Install (PTI) application for the installation of a new steam autoclave process. Based on its review of the application and other information provided by ICT and BCA, EGLE issued a Violation Notice (VN) relative to Rule 201 (No Permit to Install) and the conditions of PTI 61-14. The VN description states, "PTI 61-14 emission unit EURUBBEREX has been modified to significantly increase rubber production and a new curing system has been added".

A response to the VN and the information requested by EGLE is presented in the following sections of this letter. However, it should be clarified that the BCA facility does not produce rubber as indicated in the VN. The facility only processes, shapes, and cures rubber received from other suppliers into its final product.

1. Dates Violation Occurred

Based on records maintained by BCA, the facility's throughput first exceeded the existing permitted limit of 900,000 lb/yr for EURUBBEREX (12-month rolling period) at the end of January 2016.

Installation of the new curing system referenced in the VN began in July 2020 and was completed in January 2021. The VN indicates that installation was completed October 25, 2020, however, this was the initial target date, not the actual completion date.

2. Explanation of the Causes and Duration of the Violation

The cited violations are largely the result of high turnover for the EHS Manager position at the BCA facility. In 2017, a PTI application was prepared to increase the permitted rubber throughput rate to 3 million lb/yr (an increase from the existing 900,000 lb/yr limit). However, shortly after completing the application document, the BCA EHS Manager left the company and it was later discovered, the application was never submitted. Since that time, multiple managers have occupied the EHS Manager position, primarily focusing on employee health and safety. This resulted in a general lack of expertise related to air permitting-related issues and the installation of a new process without obtaining a modified PTI.

3. Whether the Violation is On-going

The cited violations are currently on-going and can be corrected through the issuance of a modified PTI. The corrective action (submittal of the application) has already been implemented as presented below.

4. Summary of Corrective Actions

The primary corrective action to both the cited violations is the submittal of a PTI application, which occurred on June 10, 2021, prior to issuance of the VN.

5. Dates By Which Corrective Action Will Take Place

The primary corrective action to both the cited violations is the submittal of a PTI application, which occurred on June 10, 2021, prior to issuance of the VN.

6. Steps to Prevent Reoccurrence

As previously noted, the turnover rate of the EHS Manager position at the BCA facility was a significant contributing factor to violations cited in the VN. Martinrea has assigned a senior level employee (Michael Zobel) to this position to increase communication of air permit issues to BCA staff and improve on-going compliance. Furthermore, this position now reports directly to the corporate EHS department of Martinrea, which is expected to provide more support and continuity at a corporate level, where previously the position was mostly part of the facility management.

Impact Compliance & Testing

Mr. Mike Kovalchick
EGLE Air Quality Division

Page 3
August 9, 2021

Please contact us at (734) 357-8045 or Summer.Hitchens@ImpactCandT.com should you have questions or require additional information.

Sincerely,

IMPACT COMPLIANCE AND TESTING, INC.



Summer Hitchens, M.P.H.
Sr. Project Manager

cc: Michael Zobel – Martinrea (Electronically)
Jenine Camilleri – EGLE