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October 21, 2021

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

**Subject:** Response to September 21, 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 September 21, 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 October 5, 2021. The delayed response is the direct result of the previous EHS Manager no longer being employed with Martinrea and communication of the VN not being communicated to other parties. This document was prepared under the direction and approval of Ms. Chelsea Roumell, HR Manager.

A response to the VN and the information requested by EGLE is presented in the following sections of this letter.

**Permit Condition Violated: PTI 61-14 Special Condition VIII (SVAUTOCLAVE1, 2 and SVOVEN)**

**1. Dates Violation Occurred**

It is estimated the BCA facility first installed rain caps on SVAUTOCLAVE1,2 and during 2018. Between 2016 and 2021, there has been significant turnover of the EHS Manager responsible for air permit compliance and therefore an exact timeframe is unknown.

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### 2. Explanation of the Causes and Duration of the Violation

The stacks (SVAUTOCLAVE1,2 and SVOVEN) had rain caps installed to mitigate environmental conditions from adversely affecting the blower operations of the stacks, by installing the rain caps the facility violated the existing permit conditions. The exact duration is unknown, the estimated duration is 4-years.

#### Whether the Violation is On-going

The cited violations are not currently on-going, the corrective action has already been implemented as presented below.

### 3. Summary of Corrective Actions

The corrective action was to remove the rain caps from the applicable stacks. The rain caps were removed. Attached are the pictures showing the removed rain caps.

### 4. Dates By Which Corrective Action Will Take Place

The corrective action took place on September 28, 2021.

### 5. Steps to Prevent Reoccurrence

The rain caps were permanently removed from the stack and therefore there should be no further reoccurrences.

### Permit Condition Violated: PTI 61-14 Special Condition VI.2.a-e

#### 1. Dates Violation Occurred

Based on records maintained by BCA, the facility failed to calculate HAP emission beginning in August 2021.

#### 2. Explanation of the Causes and Duration of the Violation

The cited violation is largely the result of high turnover for the EHS Manager position at the BCA facility. The turnover rate has resulted in general lack of expertise related to air permitting and compliance related issues for PTI related compliance. The duration of the violation has been estimated to be 3-months.

#### 3. Whether the Violation is On-going

The cited violation is not currently on-going. The HAP emission calculations have been updated through September 2021 and placed in the site-file. Records are accessible through request.

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### 4. Summary of Corrective Actions

The primary corrective action was to update the required HAP emission calculations and maintain records in the on-site files.

### 5. Dates By Which Corrective Action Will Take Place

The corrective action has been completed and the site files updated for the most recent data.

### 6. Steps to Prevent Reoccurrence

As previously noted, the turnover rate of the EHS Manager position at the BCA facility was a contributing factor to violation cited in the VN. Additional personnel have been made aware of the monitoring and recordkeeping requirements.

Please contact us at (734) 357-8045 or [Summer.Hitchens@ImpactCandT.com](mailto: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: Chelsea Roumell – Martinrea (Electronically)  
Jenine Camilleri – EGLE







