

The **Korex** Corporation

50000 Pontiac Trail, Wixom, MI 48393
Telephone: (248) 624-0000 | Fax: (248) 624-0506

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Received
10/19/22
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Within this letter the current conditions and appropriate corrections are outlined in response to the violation notice received by the Korex Corporation located at 50000 Pontiac Trail, Wixom, Michigan 48393 on September 28th, 2022.

The violations outlined were observed during an announced and routine inspection conducted by the Department of Environment, Great Lakes, and Energy (EAGLE), Air Quality Division (AQD). The purpose of the inspection was to determine the Korex 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 Permit to Install (PTI) number 539-96.

Finding:

The facility installed a powder packing line (Line 4) in 2017, which has the potential to emit air pollutants regulated by the Clean Air Act. The facility did not apply for a permit to install for the addition of this emission unit.

Rule/Permit Condition Violated:

Michigan Administrative Rule 201

Root Cause: Korex and third party set up assistance constructing LN4 were not aware that the packing line required a permit as the line only packed product (it does not manufacture the powder) and it was completely enclosed in the building with no stack being utilized.

Actions Taken:

As of 10-11-2022 no actions have been taken.

Corrective Action: Current Korex management with experience in permit requirements is not 100% convinced that the packing line needs a permit for air quality reasons. As such, Korex is requesting a follow up and explanation on the reasons why this particular packing line requires a permit. Should the conclusion of said follow up be that all parties are in agreement that the line does require a permit, then Korex will take the necessary actions needed to acquire that permit.

Date of Violation Occurrence: 2017

Due Date: TBD

Finding:

The facility does not maintain daily records of pressure differential readings for fabric filters as required by the permit. Records should be kept on file for a period of at least two years.

Rule/Permit Condition Violated:

PTI 539-96 Special Condition 6

Root Cause: Korex has no record of ever keeping this data and did not have an available copy of the permit stating this requirement. It is concluded that the a previous owner of MAERS reporting did not properly implement this practice or properly inform other Korex employees and did not maintain a controlled process/set of instructions detailing this requirement.

Actions Taken:

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As of 10-11-2022 no actions have been taken though Korex would like to note that EAGLE AQD representatives have been on site numerous occasions since the initial violation finding and has continuously found the dust collection system operating within specified ranges.

Corrective Action:

Korex is to create a form to record these daily readings that will be kept in a binder in the control room where readings will be taken. A procedure will be created and either be added to an existing SOP or implemented as a new SOP outlining this requirement. As such this SOP will be incorporated into the Korex controlled document system and subject to annual review and refresher training. Additionally, the requirement to maintain these records for a minimum of two years will be incorporated into an existing Korex record retention SOP P-DOC-03.

Date of Violation Occurrence: No records available to determine when readings stopped.

Due Date: January 2nd, 2023

Finding:

At the time of permit approval, the facility was required to implement the maintenance schedule attached in the permit and could adjust frequency over time. However, the facility was unable to provide records to indicate regular, scheduled maintenance during inspection.

Rule/Permit Condition Violated:

PTI 539-96 Special Condition 9

Root Cause: Process for maintaining a maintenance schedule was not controlled rather an informal process kept by the head of the maintenance department. As such during a period of high turnover in recent years the process broke down to the point to where the knowledge that this was a requirement was no longer known at the facility.

Actions Taken: maintenance tasked with creating of PM schedule specific for dust collectors and creation of tracking forms to be turned into QA Manager upon each completion of a scheduled PM. Drafted process and forms expected by 10-28-2022.

Corrective Action: Create a PM schedule in the Korex controlled document system. Create a form and process for keeping that form as proof of PM in the Korex controlled document system. Implement new process once completed.

Date of Violation Occurrence: Began in 2017

Due Date: January 2nd, 2023

Finding: The Facility did not provide records for NOx or CO emissions from April 2019 onwards.

Rule/Permit Condition Violated:

PTI 539-96 Special Condition 10

Root Cause: MAERS reporting responsibility at Korex has transferred through several individuals and departments since 2019. Proper handoff never occurred and the tracking and reporting of NOx and CO was dropped.

Actions Taken: Korex already maintains records needed to backfill this data.

Corrective Action: Korex to re-apply the practice of keeping a 12 month rolling sum of NOx and CO output from heaters and boilers and report again starting with the 2022 MAERS submission.

Date of Violation Occurrence: April 2019 onwards

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Due Date: At the time of the upcoming 2022 MAERS submission.

Should any further clarification or amendment to above outlined actions be needed please contact The Korex Corporation Wixom facility QA Manager at (248)624-0000x286 or email at crankin@korex-us.com.



QA Manager
The Korex Corp.

Wixom Plant