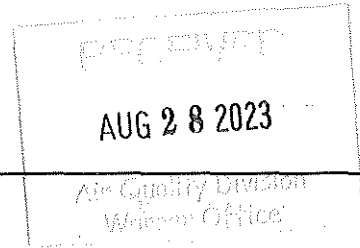


The **Korex** Corporation

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



June 27th, 2023 Violation Notice Response and CAPA

On June 27, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Korex Corporation located at 50000 Pontiac Trail, Wixom, Michigan. The purpose of this inspection was to determine 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 to investigate a recent complaint which we received on June 26, 2023, regarding odors attributed to Korex Corporation's operations.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|---|---|
| Detergent odor | Michigan Air Pollution Control Rule 901 | While conducting odor observations downwind of Korex, staff experienced distinct, identifiable detergent odors six times, for up to 5 seconds in duration, in the span of less than 30 minutes. |

In the professional judgment of AQD staff, the odors that were observed were of sufficient intensity, frequency and duration so as to constitute a violation of Rule 901 of the administrative rules promulgated under Act 451 (General Condition 8 of PTI number 539-96).

The AQD staff detected odors along Wixom Road, Pontiac Trail, and Manistee Street, downwind at the time of observations.

Response & Actions:

It is the opinion of responsible parties at the Korex Corporation that the identification of such odor is not grounds for violation due to the profile of the odor and perceived intensity in areas in and within the immediate vicinity of the operations producing such odor. For example, odor of said profile and intensity is clearly present in detergent aisles at retail stores and arguments could be made for other operations producing subjectively non-offensive odors.

With the above statement considered, Korex does commit to keep a good relationship with EGLE representatives and the community in which odors were observed. Korex maintains

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frequent contact with EGLE and holds continuous improvement discussions in regards to how to minimize odor impact on surrounding areas while not necessarily being able to eliminate odor. Korex is open to suggestions such as getting insight from multiple EGLE representatives some of which may have experience with similar situations and offer guidance. Korex is currently working to minimize duration of open bay doors during hours of operation to mitigate odors escaping the facility through said means. Other actions and means of odor minimization are to be determined as conversation between Korex and EGLE continues.

Colin Rombi
QA Manager

8-23-23

Wixom Plant