



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

September 28, 2022

VIA E-MAIL AND U.S. MAIL

Collin Rankin  
Quality Assurance Manager  
Korex Corporation  
50000 Pontiac Trail  
Wixom, MI 48393

SRN: B5619, Oakland County

Dear Collin Rankin:

**VIOLATION NOTICE**

On July 29, 2022, 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 48393. 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 the conditions of Permit to Install (PTI) number 539-96.

During the inspection, staff observed the following:

<b>Process Description</b>	<b>Rule/Permit Condition Violated</b>	<b>Comments</b>
Contract powdered detergent manufacturing	Michigan Administrative Rule 201	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.
Contract powdered detergent manufacturing	PTI 539-96 Special Condition 6	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.

Contract powdered detergent manufacturing	PTI 539-96 Special Condition 9	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.
Contract powdered detergent manufacturing	PTI 539-96 Special Condition 10	The facility did not provide records for NOx or CO emissions from April 2019 onwards.

During this inspection, AQD staff were notified of the installation and operation of a packing line (Line 4) that was installed in 2017 without a permit to install. This is in violation of Rule 201, which requires a facility to apply to the department for a permit to install before the installation, construction, reconstruction, relocation, or modification which may emit any air contaminants or any air pollutant regulated by the Clean Air Act and associated rules.

During this inspection, Korex Corporation was unable to produce maintenance records and emission records for NOx and CO. This is a violation of the recordkeeping and maintenance requirements specified in Special Conditions 6, 9, and 10 of PTI number 539-96.

PTI number 539-96, Special Condition 6 requires the facility to monitor and record the pressure drop across all fabric filters on a daily basis and keep readings on file for a period of at least two years and make records available to AQD staff upon request.

PTI number 539-96, Special Condition 9 requires that the facility not operate the system unless the preventative maintenance program included in the permit is implemented and maintained.

PTI number 539-96, Special Condition 10 requires that the heater and boilers of the facility do not exceed NOx emissions of 4.4 lb/hr and 15 tons per year based on a rolling 12-month sum, and do not exceed CO emissions of 1.2 lb/hr and 4.0 tons per year based on a rolling 12-month sum.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 19, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are

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proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Korex Corporation believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Korex Corporation. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Noshin Khan  
Environmental Engineer  
Air Quality Division  
586-536-1197

cc: Mary Ann Dolehanty, EGLE  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Joyce Zhu, EGLE