



GRETCHEN WHITMER
GOVERNOR

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



AARON B. KEATLEY
ACTING DIRECTOR

June 22, 2023

VIA E-MAIL ONLY

Bill Kleine
Korex Corporation
50000 Pontiac Trail
Wixom, MI 48393

SRN: B5619, Oakland County

Dear Bill Kleine:

VIOLATION NOTICE

On April 19, 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; the conditions of Permit to Install (PTI) number 539-96; and to investigate complaints which we received on April 11, 13, 14, and 18, 2023, regarding odors attributed to Korex Corporation's operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Detergent manufacturing system/s	Permit to Install (PTI) 539-96, Special Conditions (SC) 3 & 4; Michigan Air Pollution Control Rule 910	Staff observed visible emissions from the system (violating SC 3); system was operated with torn fabric filter (violating SC 4 and Rule 910).
Detergent manufacturing system/s	PTI 539-96, SC 9	Preventative maintenance plan for the dust collector has not been implemented/ maintained.
Detergent manufacturing system/s	Michigan Air Pollution Control Rule 912	Abnormal condition resulted in air contaminant emissions for more than two hours in excess of standard set by PTI 539-96, SC 3.

During this investigation the AQD staff observed operation of detergent production lines while a bag filter was malfunctioning.

This constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. This also constitutes a violation of PTI 539-96 SC 4, which states that the facility shall not operate the system unless appropriate fabric filters are installed and operating properly.

Staff observed visible emissions from a process stack due to the torn fabric filter. This constitutes a violation of PTI 539-96 SC 3, which states that there shall be no visible emissions from the system. Based on the duration of visible emissions observed during the inspection, these emissions occurred for more than two hours. The facility did not report abnormal operation resulting in air contaminant emissions for more than two hours in excess of the standard set by PTI 539-96 SC 3. This constitutes a violation of Rule 912(3).

During the inspection, staff requested records showing the implementation of the maintenance schedule included in PTI 539-96. Korex staff indicated that general maintenance is performed weekly but was not able to verify that maintenance actions listed in the permit are performed according to the included schedule. This constitutes a violation of PTI 539-96 SC 9, which states that the facility shall not operate systems unless the preventative maintenance program in the permit has been implemented and maintained.

Per Rule 911, AQD is requesting that the facility submit a malfunction abatement plan that includes weekly checks of bag filters and other actions to prevent reoccurrence of the observed abnormal condition.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by July 13, 2023, (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 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 odor complaint investigation at 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: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Joyce Zhu, EGLE
Collin Rankin, Korex Corporation