



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 20, 2020

Mr. Blake Albritton, President
Temperform, LLC
25425 Trans-X Road
Novi, Michigan 48375

SRN: B7357, Oakland (63) County

Dear Mr. Albritton :

VIOLATION NOTICE

On October 4, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an odor survey inspection of Temperform, LLC (Temperform) located at 25425 Trans-X Road, Novi, Michigan. The purpose of this inspection was to determine Temperform'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.

During the October 4, 2020, odor survey inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Temperform's entire foundry facility including casting, burn-off oven, sand reclamation system, etc. PTI No. 60-00B Small Area Source Foundry NESHAP / MACT 5Z	Rule 336.1901 Unreasonable interference with the comfortable enjoyment of life and property	Trans-X Road sidewalk, adjacent to Main Street Village Singh Apartments about 12:20 through 3:50 hours: (52 °F and 4 mph WSW wind) almost continuous strong odor was detected.

The AQD staff detected odors in a residential area near Temperform on the Trans-X Road sidewalk, adjacent to Main Street Village Singh Apartments. 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.

Our discussion for odor nuisance mitigation includes the following:

1. Revising the existing permit PTI No. 60-00B to PTI No. 60-00C that updates it to contemporary format and includes the mitigation program.
2. An afterburner for the burn-off shall be operated properly at minimum 1,400 °F and the temperatures shall be logged and tabulated using MS Excel.
3. The ventilation, capture and air balance systems shall be operated such that 100% indoor casting and miscellaneous emissions are captured and delivered to the scrubber system.

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4. The scrubber and sand reclamation stacks shall be modified to increase heights and reduce exhaust discharge cross sectional areas (tapered) such that air contaminants are diluted and dispersed farther.
5. The fans shall be redesigned to handle the changes and be replaced.

During the October 4 inspection, although the company has installed an afterburner; however, due to COVID-19 US-Canada border restrictions, the afterburner was not ready for operation and continued to be idle while the burn-off oven was operating.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **November 10, 2020** (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 Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Temperform 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 violation cited above and for the cooperation that was extended to me during my inspection of October 4, 2020. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
Konanahalli@Michigan.Gov

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. Robert Joseph, EGLE
Ms. Annette Switzer, EGLE
Mr. Mark Mitchell, EGLE
Mr. Jeff Rathbun, EGLE