

July 18, 2022

Mr. Michael Cox  
Environmental Quality Analyst  
Air Quality Division  
Grand Rapids District  
350 Ottawa Ave. NW  
Unit 10  
Grand Rapids, MI 49509

NBHX Trim USA  
1020 7 Mile Road  
Comstock Park, MI 49321



RE: RTO Test - Violation Notice Response for SRN N2614 - NBHX Trim USA

Dear Mr. Cox:

This letter is in response to the Violation Notice received from you on July 5, 2022 regarding the terminated RTO emission compliance test on June 28, 2022.

The reason the test was postponed was that pre-test conditions indicated a higher background of VOC's than what was expected and was not consistent with normal operation. Considering this, and not wanting to waste resources and time, the decision was made to not conduct the test and instead, inspect the damper mechanism integrity and repair if necessary.

On July 4, an inspection of the damper mechanism was completed, and it was found that the gasket material that seals the damper plate to the ductwork to redirect exhaust air into the RTO beds had completely deteriorated and was no longer there. We believe that with no gasket in place, emissions were leaking past the damper plate causing the high background. This condition would have negatively impacted the testing that was about to take place. Up till that time, all indications of the RTO performance appeared to be that it was operating properly and maintaining the required temperature.

The gasket material was replaced that same day. The damper plate was observed as it was rotated back and forth several times at normal operating air pressure and it appeared to rotate and seal properly.

To prevent re-occurrence of this condition in the future, we will implement an inspection of the damper plate every 3-4 months to ensure the gasket integrity is still functional.

Sincerely



Dan Madden

Plant Engineer/Facilities & Maintenance Manager,  
Environmental, Health & Safety Compliance

NBHX TRIM GROUP – NBHX Trim Corporation  
1020 7 Mile Road | Comstock Park | MI 49321 | USA  
phone: +1 616 802 4120 | mobile: +1 616 460 5729

Cc: Ms. Jenine Camilleri EGLE