



1902 Northwood
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May 11, 2023

Re: Violation Notice

Mr. Owen Pierce
Environmental Engineer
Air Quality Division, Warren District
27700 Donald Court
Warren, MI 48092

Dear Mr. Pierce;

Please accept my apologies for the non-compliant conditions that occurred on March 22, 2023 during your inspection of our facility at 1902 Northwood, Troy.

As you know, we had two non-compliant conditions associated with the new burn-off oven recently installed at our location. We are unsure of exactly how long the low temperature condition was in place. We estimate it to have been occurring intermittently for just 2-3 days. We are unsure of the duration because the temperature chart recorder had not been replaced as required (this device has an older paper recorder). Our failure to replace the paper chart on a daily basis is, as you know, the second violation observed during the inspection.

Both of these conditions were remedied on the same day of the inspection (March 22, 2023). The paper temperature recorder was replaced immediately, and we are ensuring that it is replaced daily. Also, we contacted our supplier and arranged for an immediate service call on that very same day. Our supplier discovered a faulty temperature controller and it was replaced.

Beginning March 23, 2023 we resumed compliant operations and we have remained compliant since that date. We have retrained personnel to ensure full understanding of our requirements. Chart recording paper is now replaced daily and operators are required to check the afterburner temperature before each use and only use the equipment at temperatures above 1400 degrees F.

The corrective actions have been confirmed to be adequate since the date of initiation (March 23); however, to better ensure compliance, we have put in motion the following improvements.

- A digital temperature recorder will replace the older device that requires paper. This new device is on order will be installed in the next few weeks.
- Control panel changes are being made to allow a warning signal in the event that the after-burner temperature falls below 1400 degrees F. These changes are expected to be in place in the next couple of days.

I will confirm with you when each of the above actions are completed.

Best regards,

Ted Howard
General Manager