



September 13, 2017

Mr. Robert Joseph
Environmental Engineer
Air Quality Division
Department of Environmental Quality

Dear Mr. Joseph,

I am responding to you in reference to violation notice SRN: P0836, Oakland County. This violation was recorded based upon a site visit on July 19, 2017 to our facility at 23149 Commerce Drive in Farmington Hills, Michigan.

In reference to your report, visible emissions were observed and a burnt odor was verified downwind from our facility. As a result of your investigation, we had a commercial contractor come to our facility and evaluate the filtering system. The contractor verified that emissions were escaping from our exhaust stack on our TPS1 machine. We disassembled our TPS1 plasma spray coating machine and found that one of the large exhaust filters had developed a hole through the cartridge. This hole allowed oil to escape from the exhaust stack and subsequently resulted in the white smoke and objectionable smell that was observed by your team. We cleaned the exhaust stack and replaced the cartridge filter. The repairs were completed on August 9, 2017. At the same time as the repair, we encountered an electrical issue in the Farmington Hills area that damaged a lot of our machinery and equipment. We were finally able to get the system back online three weeks ago without any recurrence of the incident.

In addition to the replacement of the filter, the commercial contractor suggested that we add a secondary filter as further insurance against future incidents. We have purchased a secondary filter, an Edwards Model 291-300S Oil Mist Separator, as a precautionary step. The secondary filter just arrived and we have it scheduled to be installed by the contractor on September 29, 2017.

We are confident that the repair solved the problem and the additional filtration will provide another level of defense against it ever occurring again. We sincerely apologize to our neighbors for any discomfort caused by the odor emitting from our facility. We have been checking our outside environment daily and we have not found any issues with our current operation.

Please let me know if I can be of any further assistance.

Sincerely,

Jim Diroff

Digitally signed by Jim Diroff
DN: cn=Jim Diroff, o=Orchid Orthopedic
Solutions, ou=Orchid
email=Jim.Diroff@orchid-ortho.com, c=US
Date: 2017.09.13 16:25:50 -0400

Jim Diroff
Site Manager