



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

August 25, 2017

Mr. Mark A. Olson
Purchasing Manager
Orchid Orthopedics Solutions
23149 Commerce Drive
Farmington Hills, MI 48335

SRN: P0836, Oakland County

Dear Mr. Olson:

VIOLATION NOTICE

On July 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Orchid Orthopedic Solutions located at 23149 Commerce Drive, Farmington Hills, Michigan. The purpose of this inspection was to determine Orchid Orthopedic Solutions' 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; and to investigate a recent complaint which we received on July 18, 2017, regarding foul odors attributed to Orchid Orthopedic Solutions' operations.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Plasma Spray Coating Booths	R.336.1901 (Rule 901) Air contaminant or water vapor; prohibition.	Burnt odor verified downwind from the facility was objectionable and of sufficient intensity, frequency, and duration to cause Rule 901 violation.
Plasma Spray Coating Booths	R.336.1910 (Rule 910) Air Cleaning Devices.	Visible emissions were observed consisting of a white plume possibly due to powder residual from the booths.

On July 19 and July 26, 2017 odor evaluations were conducted after complaints were filed. AQD staff observed white plume accompanied by burnt odor downwind of Orchid Orthopedic Solutions. A follow-up odor evaluation was also conducted on August 2, 2017. AQD staff observed the same white plume accompanied by burnt odor downwind of Orchid Orthopedic Solutions.

Mr. Mark A. Olson
Page 2
August 25, 2017

AQD Administrative Rule 336.1910: Air-cleaning devices, states:

Rule 910. An air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

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. The AQD staff detected odors in a residential area near the company along Fox Creek Street.

AQD Administrative Rule 336.1901: Air contaminant or water vapor: prohibition, states:

Rule 901. Notwithstanding the provisions of any other rule, a person shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:

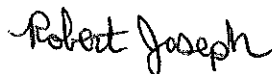
- (a) Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.
- (b) Unreasonable interference with the comfortable enjoyment of life and property.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **September 15, 2017** (which coincides with 21 calendar days from the date of this letter). The written response should include: an explanation of the causes and duration of the violations; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Orchid Orthopedic Solutions 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 inspection of Orchid Orthopedic Solutions. 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,



Robert Joseph
Environmental Engineer
Air Quality Division
586-753-3735

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Joyce Zhu, DEQ