



**May 19, 2022**

Iranna Konanahalli,  
Senior Environmental Engineer  
Michigan Department of Environment, Great Lakes, and Energy  
Air Quality Division  
Warren District Office  
27700 Donald Court  
Warren, MI 48092-2793

**Re:** SRN: P1195 Violation Notice dated May 13, 2022  
Tenibac, 35155 Automation Drive, Clinton Twp, MI 48035

Dear Mr. Konanahalli:

This is a letter in response to the Michigan Department of Environment, Great Lakes, and Energy (Michigan EGLE), Air Quality Division's (AQD) violation notice dated May 13, 2022 pertaining to Permit-to-Install No. 32-21, EU-MOLDTECH issued to the above referenced facility following a compliance inspection on April 5, 2022.

The cited violations and the associated corrective action plans are as follows:

**1. Tenibac has failed to submit O&M Plan since June 2021 and did NOT perform the O&M Plan required inspections, as required by the permit.**

Tenibac is in the process of preparing an Operation and Maintenance Plan (OMP) for the packed bed scrubber, and this plan will be provided to the AQD on or before by **July 11, 2022**. Also, while the OMP is being developed, the facility has contracted Vanaire, the equipment manufacturer, to perform an inspection of the packed bed scrubber as part of the preventive maintenance program. Attachment A presents the Vanaire Preventive Maintenance Report dated May 2, 2022.

**2. The company did NOT monitor and record packed bed pressure drop and inlet velocity pressure.**

1. Initiated daily monitoring and recording of scrubber pressure drop readings.  
(Attachment B presents the form proposed to be utilized by the facility to record pressure drop readings)
2. Maintain all daily monitoring records, and inspection records.
3. Letter from Vanaire, equipment manufacturer, explaining that the inlet velocity pressure measurements may not be necessary. The facility needs to ensure that the Magnehelic gauge reading is between 1 inch and 3 inches of water.

Should you have any questions, please feel free to contact me or Mr. Biplab Roy, Director and Senior Consultant of Advanced Matrix, Inc. at [broy@advanced-matrix.com](mailto:broy@advanced-matrix.com).

Sincerely,

*Michael Finch*

Mike Finch  
EHS Coordinator N.A., Laser Safety Officer  
Standex Engraving, Mold-Tech