



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
WARREN DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 13, 2022

VIA E-MAIL AND U.S. MAIL

James Hooven, President
Tenibac-Graphion, Inc.
35155 Automation Drive
Clinton Township, Michigan 48035

SRN: P1195, Macomb County

Dear James Hooven:

VIOLATION NOTICE

On April 5, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Tenibac-Graphion, Inc. (Tenibac or "the company") located at 35155 Automation Drive, Clinton Township, Macomb County, Michigan. The purpose of this inspection was to determine Tenibac's 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 the conditions of Permit-to-Install number 32-21.

During the April 5, 2022, inspection, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-MOLDTECH, Nitric acid etching line with a packed bed scrubber for control of acidic emissions. Push-pull capture system for each tank deliver air contaminants (specifically acidic, HCl, HNO ₃ , etc.) to the packed bed scrubber system.	PTI No. 32-21 EU-MOLDTECH, Condition III. & VI.3	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.
EU-MOLDTECH, Nitric acid etching line with a packed bed scrubber for control of acidic emissions. Push-pull capture system for each tank deliver air contaminants (specifically acidic, HCl, HNO ₃ , etc.) to the packed bed scrubber system.	PTI No. 32-21 EU-MOLDTECH, Condition VI.2	The company did NOT monitor and record packed bed pressure drop and inlet velocity pressure.
Acid etching processes were installed in 1996 in this building. But the packed bed scrubber was installed in 2020, i.e., the etching processes were installed in violation of Rule 201. However, Tenibac voluntarily obtained the permit.		

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Act 451 (Mich. Admin. Code R. 336.1910 - Air-cleaning devices), requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. Please submit, within 60 calendar days of this letter, an approvable operation and maintenance plan (O&M Plan) (PTI No. 32-21, EU-MOLDTECH, III.1).

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by **June 3, 2022** (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; 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.

Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092-2793, and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Tenibac 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 violation cited above and for the cooperation that was extended to me during my inspection of Tenibac. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the e-mail address below.

Sincerely,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
konanahalli@michigan.gov

cc: Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Jenine Camilleri, EGLE
Christopher Ethridge, EGLE
Joyce Zhu, EGLE
Jeff Rathbun, EGLE
Nicholas Carlson, EGLE
Andrew Drury, EGLE
David Dunbar, Standex
Mike Finch, Mold-Tech