MOLD MASTERS COMPANY

March 4, 2022

Ms. Jenine Camilleri
Enforcement Unit Supervisor
Lansing District Office
Michigan Department of Environment, Great Lakes & Energy
P.O. Box 30242
Constitution Hall 1st Floor South
Lansing, MI 48909-7760

Violation Notice Response
Mold Masters Company, Lapeer, Michigan

Dear Ms. Camilleri:

On July 30, 2020, Mold Masters Company submitted a request to modify their Air Use Permit to Install (PTI) to add a regenerative thermal oxidizer (RTO) to Manual Booth 5 (EUManual5), which is a stand-alone booth that applies adhesion promotor prior to the floc booths.

EUManual5 is located at 1455 Imlay City Road, Lapeer and is currently permitted under PTI 368-06C; the proposed permit has been numbered PTI 368-06D. As the adhesion promotor currently in use in the booth is 100% volatile organic carbon (VOC) and hazardous air pollutant (HAP) material, construction of the RTO is scheduled to take place as soon as possible to control emissions.

Please note, the RTO installation is part of ongoing efforts by Mold Masters to significantly reduce VOC and HAP emissions through the use of control equipment.

On or around May 20, 2021 the initial test of the installed equipment (RTO) unit noticed a significant deficiency factor in the burn off rate of the RTO unit. The root cause of this malfunction was determined to be a warp in the cycling valve bed of the RTO Unit. A new cycling valve bed had to be manufactured and scheduled for install due to issues at the manufacture and Covid Related issues the new bad was installed on December 22, 2021. The RTO unit was operational during this time but at a reduced burn off rate.

After the new cycling valve bed was installed the test was scheduled for February 1, 2022. During the initial test it was determined that the RTO unit was functioning at a rate of 94.5 – 94-8% efficiency. Just below the required 95% rate.

Steps taken to date to improve the efficiency rate of burn off are:

Mold Masters contacted the manufacturer of the RTO Unit on February to determine adjustments and recommendations to improve the efficiency rate. Data from initial testing was provided to the manufacturer to February 7, 2022. Manufacturer will provide recommendation's on unit adjustments

to Mold Masters no later than March 18, 2022.

Mold Masters has also been contact with a filter specialist on filtration of the RTO and EUFlockbooth5 for recommendations on filtration adjustments to help with airflow from the booth to the RTO unit. Filtration recommendations based off readings from the RTO and EUFlockbooth 5 are due back to Mold Masters no later than March 22, 2022.

Lead time for new filters based of the recommendations from the filter manufacturer is 4-6 weeks.

With the items referenced above Mold Masters anticipates testing of the RTO Unit to happen the week May 30, 2022.

Thank you in advance for your consideration. If you have any questions or require additional information, please contact me at 810.245.4100 ext. 208.

Sincerely,

Kirk Payne
Director of Sales

Copy: Dan McGeen – EGLE

Mold Masters Company
Monthly DEQ Report **DECEMBER 2021**
FGFacility

			Total FGFloc	Total EURobot	Total FGManual	Total FGFacility		Total FGPurge	Total FGTACs	
January	2021	Actual gallons used	560.40	83.00	567.88	1,211.27	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,181.05	166.96	465.96	1,813.97	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,018.81	2.88	1,018.81	2,040.50	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.14	-	0.14				
		98-82-8 Cumene (lbs)	-	0.12	-	0.12				
February	2021	Actual gallons used	836.82	48.00	1,232.18	2,117.00	CAS 67-64-1	100.12		Acetone (lbs)
		VOC lbs	1,586.73	81.02	2,139.08	3,806.83	CAS 98-56-6		1.75	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,318.79	2.71	1,715.91	3,037.41	CAS 540-88-5		4.92	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		0.12						
		91-20-3 Napthalene (lbs)	-	0.16	-	0.16				
		98-82-8 Cumene (lbs)	-	0.40	-	0.40				
March	2021	Actual gallons used	1,052.17	34.00	132.09	1,218.26	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,695.00	30.18	218.77	1,943.95	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,314.55	0.63	170.87	1,486.05	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.05	-	0.05				
		98-82-8 Cumene (lbs)	-	0.07	-	0.07				
April	2021	Actual gallons used	670.56	74.00	25.45	770.01	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,059.36	84.23	47.16	1,190.75	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	813.88	1.53	38.85	854.25	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.09	-	0.09				
		98-82-8 Cumene (lbs)	-	0.15	-	0.15				
May	2021	Actual gallons used	1,579.86	53.00	-	1,632.86	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	3,365.74	63.10	-	3,428.84	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	2,913.63	0.82	-	2,914.45	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.07	-	0.07				
		98-82-8 Cumene (lbs)	-	0.09	-	0.09				
June	2021	Actual gallons used	1,531.03	83.00	34.01	1,648.04	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	2,207.77	110.93	55.97	2,374.68	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,616.60	2.33	43.69	1,662.62	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.08	-	0.08				
		98-82-8 Cumene (lbs)	-	0.19	-	0.19				
July	2021	Actual gallons used	982.08	102.08	56.79	1,140.96	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,485.60	73.10	105.74	1,664.44	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,116.50	2.10	87.28	1,205.88	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.08	-	0.08				
		98-82-8 Cumene (lbs)	-	0.26	-	0.26				

Mold Masters Company

Monthly DEQ Report **DECEMBER 2021**

FGFacility

			Total FGFloc	Total EURobot	Total FGManual	Total FGFacility		Total FGPurge	Total FGTACs	
August	2021	Actual gallons used	1,775.34	64.01	23.65	1,863.00	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	2,754.07	57.22	42.93	2,854.22	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	2,096.75	1.18	35.08	2,133.01	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.10	-	0.10				
		98-82-8 Cumene (lbs)	-	0.13	-	0.13				
September	2021	Actual gallons used	772.37	73.54	18.63	864.55	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,507.01	63.17	43.12	1,613.30	CAS 98-56-6		1.75	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,265.90	1.43	38.28	1,305.61	CAS 540-88-5		4.92	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.15	-	0.15				
		98-82-8 Cumene (lbs)	-	0.17	-	0.17				
October	2021	Actual gallons used	1,184.74	63.00	18.95	1,266.69	CAS 67-64-1	100.12		Acetone (lbs)
		VOC lbs	1,569.11	55.10	35.37	1,659.58	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,091.44	1.32	24.66	1,117.42	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.07	-	0.07				
		98-82-8 Cumene (lbs)	-	0.16	-	0.16				
November	2021	Actual gallons used	1,461.42	85.92	-	1,547.34	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,980.12	100.72	-	2,080.83	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,397.35	1.63	-	1,398.98	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		0.04						
		91-20-3 Napthalene (lbs)	-	0.11	-	0.11				
		98-82-8 Cumene (lbs)	-	0.19	-	0.19				
December	2021	Actual gallons used	1,840.26	63.59	49.18	1,953.03	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	2,726.40	82.50	88.85	2,897.75	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	2,026.41	3.08	72.46	2,101.96	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-						
		91-20-3 Napthalene (lbs)	-	0.03	-	0.03				
		98-82-8 Cumene (lbs)	-	0.18	-	0.18				
	Rolling 12	Actual gallons used (yr)	14,247.05	827.14	2,158.81	17,233.01	CAS 67-64-1	1,200.27		Acetone (lbs yr)
	Rolling 12	VOC lbs (yr)	23,117.96	968.23	3,242.95	27,329.14	CAS 98-56-6		3.49	Para-Chlorobenzotrifluoride (lbs yr)
	Rolling 12	HAPS lbs (yr)	17,990.61	21.64	3,245.89	21,258.13	CAS 540-88-5		9.85	Tert-butyl Acetate (lbs yr)
	Rolling 12	67-64-1 Acetone (lbs yr)		0.17			CAS 67-64-1	0.60		Acetone (tpy)
	Rolling 12	91-20-3 Napthalene (lbs yr)	-	1.13	-	1.13	CAS 98-56-6		0.00	Para-Chlorobenzotrifluoride (tpy)
	Rolling 12	98-82-8 Cumene (lbs yr)	-	2.11	-	2.11	CAS 540-88-5		0.00	Tert-butyl Acetate (tpy)
	Rolling 12	VOC (tpy)	11.56	0.48	1.62	13.66				
	Rolling 12	HAPS (tpy)	9.00	0.01	1.62	10.63				
	Rolling 12	67-64-1 Acetone (tpy)		0.00						