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B1772



September 28, 2023,
 Project No. 230490

Shamim Ahammod Michigan Department of Environment, Great Lakes, and Energy, Air Quality
 Division 27700 Donald Court Warren, MI 48092

Response to the EGLE-AQD Violation Notice Dated September 20, 2023, Cecil Composites, LLC

Process Description	Rule/Permit Condition Violated	Comments
EUFIBERGLASS	SC VII.1 of Permit No. 94-21A	The permittee did not notify the AQD District supervisor within 90 days of starting operation.
EUFIBERGLASS	SC VIII.1 and SC IX.2 of Permit No. 94-21A	During the inspection on July 7, 2023, staff observed the permittee did not install the stack EUFIBERGLASS; however, they were operating EUFIBERGLASS

(SRN B1772) Mount Clemens, Michigan

This letter is in response to the EGLE-AQD Violation Notice dated September 20, 2023 (VN). The VN suggests that Cecil Composites, LLC (Cecil) is in violation of its air permit. The allegations cited in the VN are summarized as follows:

As requested, this letter provides information regarding the referenced citations, including: the date the alleged violations occurred; an explanation of the causes and duration of the alleged violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations; the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence. Cecil is responding individually to each of these allegations below. 1) Due to the high amount of turnover in the management team at Cecil and the uncertainty over what constituted starting production operations, the initial notification to AQD was late. Notification has now been sent. Cecil will be more cognizant of these deadlines going forward. 2) During the July 7th inspection, the stack was on site and contractors were doing preparation work to install. Moving forward, Cecil will not operate EUFIBERGLASS without the stack properly installed. The stack has been installed and in use since August 12th, 2023. If you have any questions, please contact me at 586-484-0142 or jeffk@polemfg.com

Best Regards,

Jeff Kirby
 Cecil Composites, LLC
 Plant Manager