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June 20, 2022

April Lazzaro
Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, Michigan 49503-2341

RE: Response to Violation Notice
Atlas Molded Products, a Division of Atlas Roofing Corporation
Byron Center, Michigan

Dear Ms. Lazzaro:

Atlas Molded Products (AMP), A Division of Atlas Roofing Corporation, is submitting for your review the following response to the June 7, 2022, Violation Notice issued by the Michigan Department of Environment, Great Lakes, and Energy (MDEGLE) Air Quality Division. The Violation Notice resulted from your site inspection of April 28, 2022.

Atlas Molded Products has reviewed the alleged violations and offers the following listed responses and corrective actions taken for each allegation:

1. *Flexible Group FGEPS, PTI No. 82-21A, Special Condition 1.1, and MI-ROP-N1794-2017a, Special Condition 1.1: Daily limit of 272.4 lb/hr VOC was exceeded on 18 separate days.*

AMP has reviewed the hourly emissions calculations for each month of the period of January 1, 2021, to present, and can confirm that at no time was the hourly allowable VOC emission limit of 272.4 lb/hr for Flexible Group FGEPS exceeded. The emissions spreadsheets that were submitted for your review contained errors in the operating hours recorded for certain days, including the 18 separate days where the emissions limit appeared to be exceeded. The process operating hours were under reported in these instances and that resulted in inflated hourly emissions. On most of the days where the operating hours were under reported, the error is obvious since the total amount of EPS beads expanded exceeded the maximum capacity of the equipment for that length of time. However, we did overlook this error. We have made the necessary corrections to the spreadsheet and all hourly emissions are now correctly recorded as compliant.

2. *Flexible Group FGEPS, PTI No. 82-21A, Special Condition V.1, and MI-ROP-N1794-2017a, Special Condition V.1: Failure to submit test report within 60 days following the last date of the test.*

AMP contracted with Montrose Air Quality Services, LLC, who performed the RTO stack test on March 22, 2022, according to the approved test plan submitted to MDEGLE.

On March 11, 2022, Montrose contacted MDEGLE in writing to discuss the difficulty in acquiring pentane gas cylinders for field calibration of the flame ionization detector (FID) instruments and proposed to post-calibrate the instruments in the lab with pentane gas upon receiving the gasses from their vendor. MDEGLE approved the plan, and the test was conducted with propane calibration in the field.

On April 10, 2022, Montrose contacted MDEGLE in writing to discuss the continued difficulty in acquiring pentane gas cylinders for laboratory calibration. The gas vendor reported to Montrose that the gases did not meet specification and they would need to reorder with a 3-4 week delivery estimate. On April 14, 2022, Lindsey Wells of MDEGLE replied to hold the report until the gases arrived and to "let us know the anticipated timeline once the new cylinders have been procured."

Montrose received the gas cylinders, performed the calibration and presented a draft report to AMP on May 25, 2022. AMP reviewed the draft report, returned comments to Montrose, and the final report was delivered to AMP on June 7, 2022. AMP submitted the report to MDEGLE on the same day—78 days after the test was initiated but only 13 days after the test was completed due to the calibration gas shortage.

3. *Flexible Group FGEPS, PTI No. 82-21A, Special Condition 11.3, and MI-ROP-N1794-2017a, Special Condition 11.3: Failure to calculate the production weighted average fraction VOC retained in product and failure to update pentane retention based on PTI application data.*

AMP has developed a new, automated, emissions tracking system and will recalculate emissions using the finished goods VOC retention for each bead type processed. This will likely result in a reduction in overall emissions. AMP will use the assumptions listed below:

- Pw is the production weighted average fraction of VOC retained in the product.
- Ui and Vi are the pounds of beads processed and the VOC content of those beads, respectively, for each lot of beads.
- DE, the thermal oxidizer destruction efficiency, is a static number based on stack testing.
- PE, the weight fraction of VOC in the raw beads that are emitted at expansion, appears to be a static, average number based on annual bead testing.
- Ds, densified scrap emissions, is a mixture of scrap foam from many different bead types and molded shapes. Therefore, a static, average densified scrap VOC retention percentage will be used.

4. *Facility wide MAERS submittal, Rule 2: Failure to submit complete MAERS report*

AMP submitted the RY2021 MAERS Report on March 14, 2022, prior to the deadline. In developing a new, automated, emissions tracking system, AMP discovered errors in the existing spreadsheet-based system that inflated reported emissions. AMP recalculated emissions and requested that the MAERS report be reopened for editing. On April 16, 2022, the MAERS report was reopened for auditing and the corrections to reported emissions were made the same day. However, the need to recertify the corrected report was not effectively communicated to AMP's Responsible Official and the revised MAERS report was unknowingly left uncertified. In response to the Violation Notice, AMP's Responsible Official certified the revised report on June 8, 2022. AMP is not aware of a statutory deadline for MAERS revisions.

5. *Emissions Unit EUCUTTING, Rule 201: Operating without a Permit to Install*

Emissions Unit EUCUTTING is currently listed in the ROP as a part of FGRULE290. Rule 290 exemptions, cited at Section R336.1290, are available for sources of "limited" emissions and require an accounting of emissions from the exempt equipment to demonstrate exemption status.

However, it appears that the Emissions Unit EUCUTTING is actually exempt from the permit to install requirements under Rule 285 cited at Section R336.1285. Rule 285 exemptions do not require emissions calculations and are available for (emphasis added):

"...(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(A) Equipment used on a nonproduction basis.

(B) Equipment that has emissions that are released only into the general in-plant environment.

(C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner." – R336.1285(2)(k)(l)(vi)

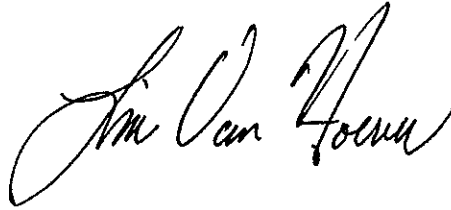
EUCUTTING's emissions are negligible and are released into the general in-plant environment with no direct exhaust outside the building. Therefore, a permit to install does not appear to be required.

If you should have any questions during your review of this information, please contact me at (616) 583-1337 or by email at tvanhoeven@atlasroofing.com; or contact our environmental consultant, David Sykes, P.E., of Access Environmental Solutions, Inc., at (662) 368-1286 or by email at david.sykes@accessenvironmental.com.

Thank you for your assistance in this matter.

Sincerely,
Atlas Molded Products, a Division of Atlas Roofing Corporation

Tim Van Hoeven
Plant Manager

A handwritten signature in black ink that reads "Tim Van Hoeven". The signature is written in a cursive style with a large, stylized initial "T".

Cc: Jenine Camilleri
Enforcement Unit Supervisor

EGLE, AQD
P.O. Box 30260
Lansing, Michigan 48909-7760