



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 16, 2020

Mr. Tim Van Hoeven  
Atlas EPS, A Division of Atlas Roofing Corporation  
8240 Byron Center Road  
Byron Center, Michigan 49315

SRN: N1794, Kent County

Dear Mr. Van Hoeven:

**VIOLATION NOTICE**

On September 25, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a notification pursuant to Rule 912, which indicated that an emission limit exceedance had occurred at Atlas EPS, a Division of Atlas Roofing Corporation (Atlas EPS) located at 8240 Byron Center Road, Byron Center, Michigan. A review of this notification and subsequent written report received on October 8, 2020 as well as supporting information received on October 9, 2020, was conducted. The purpose of this review was to determine Atlas EPS' 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 Renewable Operating Permit (ROP) number MI-ROP-N1794-2017a.

During the review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGEPS	MI-ROP-N1794-2017a, Special Condition IV.2; and Rule 910	Input feed to expander while oxidizer was not operating properly
FGEPS	MI-ROP-N1794-2017a, Special Condition III.5	Failure to expeditiously restore operation of the control device to its normal or usual manner of operation
FGEPS	MI-ROP-N1794-2017a, Special Condition VI.9; and Rule 910	Failure to properly operate low temperature alarm
FGEPS	MI-ROP-N1794-2017a, Special Condition VI.16	Failure to properly review report generated from electronic data every three hours of operation.

During a review of the Rule 912 report, and follow-up supporting information, the AQD learned that it does not appear that the emission limit of 272.4 lbs/hr based on a daily hour of operation average for VOC was exceeded. However, there was a failure of the thermal oxidizer and continued operation of the process which is not allowed.

As a result, please submit the following information required by ROP No. MI-ROP-N1794-2017a for review:

- Weekly visual inspection of gas regulators, chamber refractory, signal strengths, burner, flame appearance, and signs of leaks, deterioration, damage or developing problems for the past 6 months.
- The most recent semiannual inspection of igniter, verifying electrode condition and proper gap, and ceramic fiber lining.
- The most recent semiannual verification of interlocks and fuel valves.
- The most recent annual calibration of RTO temperature control.
- The most recent annual check of flame control, burner, high and low temperature alarms and shut-off.
- Weekly inspection of valves, piping, control valves, signal strengths, motors and linkages for the past 6 months.
- Monthly inspections of the damper plate seals and verification of actuator functionality for the past 6 months.
- Confirmation of damper replacement for past 4 quarters.
- The most recent semiannual inspection and report of lubrication of damper and fan bearings.
- The most recent semiannual reports of calibration of pressure sensor, sending device and verification of interlocks.
- Thermal oxidizer temperature records for the month of September and October (to date) 2020.
- Anticipated date of new impeller installation, or date of installation if it has been completed.

Finally, while ROP No. MI-ROP-N1794-2017a contains conditions necessary to meet the requirements of 40 CFR Part 64 for Compliance Assurance Monitoring, the permit does not contain requirements to maintain and implement a Preventative Maintenance / Malfunction Abatement Plan. Therefore, pursuant to Rule 911, the AQD requests that Atlas EPS develop and submit a Preventative Maintenance / Malfunction Abatement Plan to prevent, detect, and correct malfunctions or equipment failures, on or before November 25, 2020.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 6, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the

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dates the violations occurred; an explanation of the causes and duration of the 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 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, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Atlas EPS 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 violations cited above and for the cooperation that was extended to me during my inspection of Atlas EPS. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE