



C. HEIDI GRETHER DIRECTOR

December 13, 2017

Ms. Diane Gagnier Owosso Composites LLC 401 South Delaney Road Owosso, Michigan 48867

SRN: N2430, Shiawassee County

Dear Ms. Gagnier:

## SECOND VIOLATION NOTICE

On July 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Owosso Composites LLC located at 401 South Delaney Road, Owosso. The purpose of this inspection was to determine 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 (PTI) number 129-16A.

On September 6, 2017, the AQD sent the company a Violation Notice (VN) citing violations discovered as a result of the inspection and requested your written response which was received on September 27, 2017. The response was determined to be incomplete. In our phone conversation and your follow-up letter on November 14, 2017, a formal update was provided to me. As of this date, however, we have not received an acceptable response to all of the violations. A summary of the outstanding violations is as follows:

- 1. Development of recordkeeping spreadsheets has not been completed. This is taking longer than originally estimated by Owosso Composites and to date, records demonstrating compliance are still not being kept in a satisfactory manner.
- 2. An application to modify PTI 129-16A to address cited violations has been identified as necessary, but to date a PTI application has not been received by the AQD.

Therefore, in order to address the outstanding violations, please respond in writing, identifying actions and a timeline with exact dates for completing the actions that the company will take to resolve the remaining cited violations. Please be advised that failure to respond in writing and identifying actions the company will take or has taken to resolve the cited violations may result in escalated enforcement action by the AQD. Please provide the information requested by January 3, 2018.

In addition, be advised that your facility is subject to Title V of the Federal Clean Air Act and an administratively complete Renewable Operating Permit (ROP) application must be submitted to the Lansing District Supervisor within 12 months of commencing trial operations. Since operations started May 1, 2017, an initial ROP application is due May 1, 2018. Unresolved violations can delay the ROP application process. and failure to submit a timely ROP application will result in an escalated enforcement action by the AQD.

If you have any questions regarding the violations or the actions necessary for compliance, please contact me at the telephone number listed below.

Sincerely,

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Julie L. Brunner, P.E. Senior Environmental Engineer Air Quality Division 517-284-6789

JLB:TG

cc/via e-mail: Mr. Troy Dempsey, Owosso Composites Ms. Lynn Fiedler, DEQ Ms. Mary Ann Dolehanty, DEQ Mr. Chris Ethridge, DEQ Mr. Thomas Hess, DEQ Mr. Brad Myott, DEQ