



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

September 19, 2023

Adam Fenton, VP of Sales and Marketing
Great Lakes Composite, LLC
1732 Crooks Road
Troy, Michigan 48084

SRN: N2430, Shiawassee County

Dear Adam Fenton:

VIOLATION NOTICE

On June 10, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Great Lakes Composite located at 401 South Delaney Road, Owosso, Michigan. The purpose of this inspection was to determine Great Lakes Composite's 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-N2430-2019a.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Painting of boats non-gelcoat coatings in the permitted FGELCOAT booths.	Rule 201	Unpermitted painting process using non-gelcoat coatings on the animal boats.
Gelcoat patch and repair processes	Rule 201	Unpermitted gelcoat patch and repair processes.

During the June 10, 2022, inspection, it was noted that Great Lakes Composite had commenced operation of unpermitted processes at this facility: using a non-gelcoat paint for coating the animal boats (these activities were also conducted, unpermitted, inside the FGELCOAT booths), and conducting gelcoat patch and repair activities. The AQD staff advised Great Lakes Composite on June 10, 2022, that these processes are required to be permitted under Rule 201 of the administrative rules promulgated under Act 451.

Further discussions were had via email and via Teams calls on July 26, 2022, 11, 2022, and January 19, 2023, to discuss options for permitting of these two processes

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and a date by which Great Lakes Composite had planned to submit a Permit to Install application for these processes. On March 13, 2023, Great Lakes Composite submitted a Permit to Install application for these processes; however, the AQD Permits Section returned the application back to Great Lakes Composite for additional information on March 20, 2023.

On April 10, 2023, and again on April 24, 2023, and May 31, 2023, due to lack of a response on Great Lakes Composite's part, I requested a date by which the application would be resubmitted. In June 2023, Great Lakes Composite provided June 30, 2023, as the date by which the application would be resubmitted; however, it was not. Great Lakes Composite requested an extension of August 31, 2023, to resubmit the application. The AQD staff was informed on September 5, 2023, that the application had not been submitted.

Because the application was not resubmitted in a timely manner for unpermitted processes, the AQD is citing violations of Rule 201.

A program for compliance shall include a completed PTI application for using non-gelcoat paint for coating the animal boats in booths unpermitted for the process and conducting gelcoat patch and repair activities. An application form is available by request, or at the following website: www.michigan.gov/air.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 10, 2023, (which coincides with 21 calendar days from the date of this letter). The written response should include: the 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 recurrence.

Please submit the written response to Michelle Luplow at EGLE, AQD, Constitution Hall, Lansing District, at 525 West Allegan, First Floor South, Lansing, Michigan 48933 or LuplowM1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Great Lakes Composite 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.

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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Great Lakes Composite. 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,

A handwritten signature in cursive script that reads "Michelle Luplow".

Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-294-9294

cc: John Mason, National Composites
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE