



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

May 4, 2022

Jerry Fitch  
Plastic Trim International  
935 Aulerich Road  
East Tawas, Michigan 48730

SRN: N3592, Iosco County

Dear Jerry Fitch:

**VIOLATION NOTICE**

On April 21, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Plastic Trim International located at 935 Aulerich Road, East Tawas, Michigan. The purpose of this inspection was to determine Plastic Trim International'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 Permit to Install (PTI) number 119-20.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Malfunction Abatement Plan (MAP) for EUCOATING	PTI No. 119-20 EUCOATING Special Condition (S.C.) III.5	The permittee was required to submit a copy of the MAP to the AQD within 45 days of permit issuance. AQD did not receive a copy. At the time of inspection, AQD staff requested a copy of the MAP for EUCOATING be submitted. Facility staff were unable to provide a copy of the plan.
Continuous monitoring and recording of the temperature in the combustion chamber of the thermal oxidizer.	PTI No. 119-20 EUCOATING S.C. VI.2 and VI.8	At the time of the inspection, the facility was not monitoring and maintaining records for the RTO combustion chamber temperature. Temperature data recording shall consist of measurements made at equally spaced intervals, not

		to exceed 15 minutes per interval.
Testing to verify the VOC destruction efficiency of the RTO	PTI No. 119-20 EUCOATING S.C. V.3	A copy of the test report was not received within 60 days following the completion of testing. Furthermore, the test report submitted was incomplete.
Smoke test to verify the direction of airflow at each natural draft opening (NDO).	PTI No. 119-20 EUCOATING S.C. V.2	The permittee was required to complete a smoke test within 180 days from the issuance of PTI No. 119-20 and semi-annually thereafter. A copy of the test report must be submitted to the AQD within 60 days following testing. A copy of the test report was never received by the AQD. Facility staff were unable to provide a copy of a test report.
Records of coating usage and VOC emissions for EUCOATING	PTI No. 119-20 EUCOATING S.C. VI.4	Records of coating usage and VOC emission calculations are not in place and maintained.
Records of solvent used and reclaimed and VOC emissions for EUCOATING.	PTI No. 119-20 EUCOATING S.C. VI.5	Records of solvent usage and reclaim and VOC emission calculations were not available.
Records of each acetone-containing coating and clean-up solvent used and reclaimed, as well as records of acetone emission calculations, for EUCOATING.	PTI No. 119-20 EUCOATING S.C. VI.6	Records of each acetone-containing coating and clean-up solvent used and reclaimed, as well as records of acetone emission calculations, were not available.
Records of each naphthalene (CAS No. 91-20-3) containing coating usage, as well as naphthalene emission calculations, for EUCOATING.	PTI No. 119-20 EUCOATING S.C. VI.7	Records of each naphthalene (CAS No. 91-20-3) containing coating usage, as well as naphthalene emission calculations, were not available.

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Enclosed is a copy of the above cited Permit to Install.

During this inspection, Plastic Trim International was unable to produce process and emission records. The conditions of PTI number 119-20 require maintenance of records, which shall be made available for review upon request by the AQD staff. Records required include RTO combustion chamber temperature monitoring, material usage, and emission calculations. This is a violation of the monitoring and recordkeeping requirements specified in Section VI. Monitoring/ Record Keeping of PTI number 119-20.

Records required by S.C. VI.4 and S.C. VI.5 shall be maintained to verify compliance with the VOC emission limit of 9.31 ton per year (tpy) established by S.C. I.1.

Records required by S.C. VI.6 shall be maintained to verify compliance with the acetone emission limit of 3.0 tpy established by S.C. I.2.

Records required by S.C. VI.7 shall be maintained to verify compliance with the Naphthalene (CAS No. 91-20-3) emission limit of 83.44 lb/yr established by S.C. I.3.

Due to records not being provided, AQD staff were unable to verify Plastic Trim International's compliance with the emission limits for VOC, acetone, and naphthalene (CAS No. 91-20-3).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 25, 2022 (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 reoccurrence. As part of the written response to this Violation Notice, please also provide documentation demonstrating the emission limits for VOC, acetone, and naphthalene (CAS No. 91-20-3) were not exceeded since issuance of PTI No. 119-20 on April 30, 2021.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Plastic Trim International 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 Plastic Trim International. 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 black ink that reads "Nathanael Gentle". The signature is written in a cursive style with a large initial 'N'.

Nathanael Gentle  
Environmental Quality Analyst  
Air Quality Division  
989-778-0025

cc: Dawn Bessey, Plastic Trim International  
John Zanti, Plastic Trim International  
Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Jenine Camilleri, EGLE  
Christopher Ethridge, EGLE  
Chris Hare, EGLE