



**EAGLE INDUSTRIES INC.**

**EAGLE INDUSTRIES, INC.**

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In response to the written violation MI-ROP-N7578-2017a.

Per violation MI-ROP-N7578-2017a SC II.1, Eagle Industries temporarily utilized 14211 mold release which has a VOC/LB of 6.04 which exceeded the VOC per pound limit of 5.85.

Per violation PTI#30-20 S.C. 1.1, Eagle Industries has exceeded the allotted VOC limit of 4.7 TPY in a 12 month rolling period.

**Explanation of Causes:**

MI-ROP-N7578-2017a SC II.1 violation. Short term trial of alternate mold release was performed on EUCELL14 without confirming actual VOC content to permitted VOC content of material for EUCELL14. Mold release utilized is a material currently used within facility, however is over the VOC limit for this emission unit, which was not properly verified.

PTI#30-20 S.C. 1.1 violation. Personnel changes at Eagle Industries post final approval of the PTI resulted in communication and record keeping gap. Approved, signed PTI application with approval date 8/5/20 indicating 36.4 TPY (originally requested limit) was on file and had been used in our internal record keeping and limit calculations. Final approved detail with the 4.7 TPY limit was on file and was not identified through on-site EGLE inspection in 2021.

**Actions Taken:**

For MI-ROP-N7578-2017a SC II.1 violation, Eagle Industries is submitting a PTI with supporting documentation of increasing the VOC per pound limit on both EUCELL14 and EUCELL15 which will enable Eagle Industries to use an alternate mold release which is currently used within the facility. Alternate mold release has improved efficacy enabling lower application rate to be used.

For PTI#30-20 S.C. 1.1, Eagle Industries is submitting on the same PTI with supporting documentation of increasing the VOC limit of 4.7 TPY on EUCELL15 to 18 TPY during a 12 month rolling period. This will allow Eagle Industries to support current customer demands for product produced on the cell.

Timeline for approvals / return to full compliance:

09/15/22: PTI scope discussion with Permit Engineering

9/20/22: Preliminary PTI draft and calculations shared with Permit Engineering

9/27/22: Permit meeting scheduled for 10/5/22

10/7/22: Final PTI submission

11/4/22: Projected Permit approval following 30 day approval timeline.

**Actions Taken To Prevent Recurrence:**

PTI application to increase the VOC content limit on EUCELL14 and EUCELL15 to 6.04 lbs/gal corresponds to maximum content of any product in use within the facility.

Review of content limits and TPY Status trends has been added to internal business scorecard for annual review. Review to encompass review of actual performance compared to permit limits.

Sincerely:

A handwritten signature in black ink, appearing to read "Michael O'Brien", written in a cursive style.

Michael O'Brien

Eagle Industries