



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOUTHEAST MICHIGAN DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

January 5, 2017

Mr. Jim McLaughlin, Plant Manager
Eagle Industries, Inc.
30926 Century Drive
Wixom, Michigan 48393

SRN: N7578, Oakland County

Dear Mr. McLaughlin:

VIOLATION NOTICE

On December 19, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received manufacturer's formulation data of mold release Chem-Trend® PU-14211 applied on reaction injection molding line EUCELL12 of Eagle Industries, Inc. located at 30926 Century Drive, Wixom, Michigan. The formulation data was requested to determine Eagle Industries, Inc'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-N7578-2012c.

Upon receiving the formulation data, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Mold release application on EUCELL12	MI-ROP-N7578-2012c, EUCELL12, Special Condition (S.C.) II.1.	The facility exceeds the mold release material limit of 6.3 pounds (lbs) of volatile organic compounds (VOC) per gallon of mold release minus water as applied. Mold release PU-14211 contains 8.0 lbs VOC/gal minus water.

The formulation data provided demonstrates that the content of volatile organic compounds in mold release PU-14211 applied on EUCELL12 is 8.0 lbs VOC/gal minus water.

The conditions of ROP number MI-ROP-N7578-2012c limit the concentration of VOCs in mold release to 6.3 lbs VOC/gal minus water as applied.

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Additionally, S.C. V.1 of EUCELL12 requires Eagle Industries, Inc. to determine the VOC content of any mold release agent using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 26, 2017 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

Sincerely,



Sam Liveson
Environmental Engineer
Air Quality Division
586-753-3749

cc/via e-mail: Mr. Tom Robertson, Eagle Industries
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Joyce Zhu, DEQ