



VIA Email and Hard Copy Mail

November 19, 2024

Ms. Jenine Camilleri
Enforcement Unit Supervisor
Lansing District Office
Michigan Department of Environment, Great Lakes & Energy
P.O. Box 30242
Constitution Hall 1st Floor South
Lansing, MI 48909-7760

Violation Notice Response
Mold Masters Company, Lapeer, Michigan

Dear Ms. Camilleri:

On July 30, 2020, Mold Masters Company submitted a request to modify their Air Use Permit to Install (PTI) to add a regenerative thermal oxidizer (RTO) to Manual Booth 5 (EUManual5), which is a stand-alone booth that applies adhesion promotor prior to the floc booths.

EUManual5 is located at 1455 Imlay City Road, Lapeer and is currently permitted under PTI 368-06C; the proposed permit has been numbered PTI 368-06D. As the adhesion promotor currently in use in the booth is 100% volatile organic carbon (VOC) and hazardous air pollutant (HAP) material, construction of the RTO is scheduled to take place as soon as possible to control emissions.

Please note, the RTO installation is part of ongoing efforts by Mold Masters to significantly reduce VOC and HAP emissions through the use of control equipment.

On or around May 20, 2021 the initial test of the installed equipment (RTO) unit noticed a significant deficiency factor in the burn off rate of the RTO unit. The root cause of this malfunction was determined to be a warp in the cycling valve bed of the RTO Unit. A new cycling valve bed had to be manufactured and scheduled for install due to issues at the manufacture and Covid Related issues the new bad was installed on December 22, 2021. The RTO unit was operational during this time but at a reduced burn off rate.

After the new cycling valve bed was installed, the test was scheduled for February 1, 2022. During the initial test it was determined that the RTO unit was functioning at a rate of 94.5 – 94-8% efficiency. Just below the required 95% rate.

Steps taken to date to improve the efficiency rate of burn off are:

Mold Masters contacted the manufacturer of the RTO Unit in February to determine adjustments and recommendations to improve the efficiency rate. Data from initial testing was provided to the manufacturer to February 7, 2022. Manufacturer will provide recommendations on unit adjustments

to Mold Masters no later than March 18, 2022.

Mold Masters has also been in contact with a filter specialist on filtration of the RTO and EUFlockbooth5 for recommendations on filtration adjustments to help with airflow from the booth to the RTO unit. Filtration recommendations based off readings from the RTO and EUFlockbooth 5 are due back to Mold Masters no later than March 22, 2022.

Lead time for new filters based of the recommendations from the filter manufacturer is 4-6 weeks.

11/18/2024

EUFlockBooth5 AQD 2023-03 Paragraph 10A Stack Testing --

Mold Masters has completed the items previously listed with no improvement to stack testing performance. Mold Master has hired an outside company that specializes in maintenance and performance improvements to evaluate and test the RTO as it is running, the scheduled date is 01/09/25.

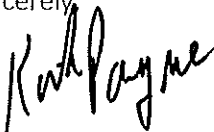
The unit will be tested and evaluated on where the improvements need to be made. This can result in logic and program changes to the RTO unit itself to get the correct burn off as required. These tests will be preliminary and are to evaluate the proper function of the unit before and after modifications.

EUFlockBooth5 PTI No. 368-06D -- the above actions and service of the RTO unit are to get the unit in compliance, after initial testing and modification Mold Masters will schedule stack testing to commence with the state. Mold Masters will report the findings before modification and any modifications that are made to get the unit in compliance.

Mold Masters anticipates that most changes will be software and programming changes based on the exchange of information with the contractor. Major hardware or structure changes are not anticipated, which could further delay compliance.

Thank you in advance for your consideration. If you have any questions or require additional information, please contact me at 810.245.4100 ext. 208.

Sincerely,

A handwritten signature in black ink that reads "Kirk Payne". The signature is written in a cursive, flowing style.

Kirk Payne
Director of Sales

Copy: Dan McGeen -- EGLE