



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

January 29, 2020

Mr. John Hubbarth, Chief Operating Officer  
Mold Masters Company  
1455 Imlay City Road  
Lapeer, Michigan 48446

SRN: A2809, Lapeer County

Dear Mr. Hubbarth:

**VIOLATION NOTICE**

On July 23, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Mold Masters Company (Mold Masters) located at 1455 Imlay City Road, Lapeer, Michigan. The purpose of this inspection was to determine Mold Masters' 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 368-08C.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFacility	PTI No. 368-08C, Special Condition FGFacility I.1	Hazardous air pollutant limit in opt-out permit exceeded

Records provided to AQD as part of the inspection process demonstrate that actual emissions of a single hazardous air pollutant (HAP) from FGFacility were 9.46 tons per year (TPY), for the 12-month rolling time period ending with May of 2019. Opt-out PTI No. 368-08C contains limits set to restrict Mold Masters' potential to emit to below major source thresholds, to keep it from becoming a major source. Special Condition FGFacility I.1 limits the emissions of any single HAP to no more than 9.0 TPY per 12-month rolling time period as determined at the end of each calendar month.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source, to demonstrate whether or not Mold Masters is a major source for air emissions. Information on calculating PTE can be found at <http://www/michigan.gov/deqair>. Choose the "Permits" Tab, then "Air Permitting-Potential to Emit" under the Air Permitting Assistance Heading.

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Please be aware that Michigan Air Pollution Control Rule 210 requires that a facility which is a major source must submit an administratively complete application for a Renewable Operating Permit, within 12 months of becoming a major source.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 19, 2020 (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.

Please submit the written response to EGLE, AQD, Lansing District, at Constitution Hall, 525 West Allegan, First Floor South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Mold Masters 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 Mold Masters. 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,



Daniel A. McGeen  
Environmental Quality Analyst  
Air Quality Division  
517-284-6638

cc: Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Brad Myott, EGLE