



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 20, 2022

VIA E-MAIL

Kirk Payne, Director of Sales
Mold Masters Company
1455 Imlay City Road
Lapeer, Michigan 48446

SRN: A2809, Lapeer County

Dear Kirk Payne:

SECOND VIOLATION NOTICE

On January 31 and February 11, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was contacted by Mold Masters Company (Mold Masters) located at 1455 Imlay City Road, Lapeer, Michigan. These communications, by email and by telephone, were to discuss 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 368-06D, and Consent Order AQD No. 2020-19.

On February 15, 2022, the AQD sent Mold Masters a Violation Notice citing violations discovered as a result of these communications and requested your written response by March 8, 2022. A copy of that letter is enclosed for your reference.

A response was received from Mold Masters on March 14, 2022. The response referred to the current Mold Masters PTI as PTI 368-06C, which was voided by AQD on January 29, 2021, upon issuance of the current PTI 368-06D. Additionally, emissions reported in an attached spreadsheet were broken down by flexible group from PTI 368-06C, and not broken down by flexible group as in PTI 368-06D. Furthermore, not all violations were addressed by the VN response letter, as described below.

PTI No. 368-06D, Special Condition (SC) III. 4 requires that within 180 days from commencement of trial operation of the Regenerative Thermal Oxidizer (RTO) associated with EUFlockBooth5, Mold Masters submit, implement, and maintain a malfunction abatement plan (MAP), as described in Michigan Air Pollution Control Rule 911. The Mold Masters VN response letter did not address the subject of the MAP, and AQD has still not received a MAP, as of today's date.

Kirk Payne
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PTI No. 368-06D, SC IV. 3 requires that Mold Masters not operate EUFlockBooth5 unless the RTO and associated Permanent Total Enclosure (PTE) are installed, maintained, and operated in a satisfactory manner, with satisfactory operation of the RTO including, but not limited to, a minimum volatile organic compound (VOC) destruction efficiency (DE) of 95 percent (by weight). Stack testing prior to the VN had not met the minimum required DE. The Mold Masters VN response letter indicated that a retest was anticipated to take place the week of May 30, 2022. Please continue to keep AQD informed of the date of the retest, so that AQD staff may be present.

Rule 910 of the administrative rules promulgated under Act 451 requires that an air-cleaning device be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law. A passing stack test would demonstrate compliance with Rule 910.

PTI No. 368-08D, SC V. 3 requires that within 180 days from commencement of trial operation of EUFlockBooth5, the permittee shall verify that the associated enclosure meets the definition of PTE or verify capture efficiency of the enclosure by testing. The Mold Masters VN response letter received on March 14, 2022, indicated that testing was currently planned for late May 2022. Please keep AQD apprised of plans for the testing, so that AQD staff can be present to witness the test.

On April 4, 2022, the AQD emailed you a PDF copy of PTI 368-06D, and a link to the Consent Order AQD number AQD 2020-19. The AQD also asked questions about the VOC emissions reported for the operating year of 2021, as described below.

In PTI 368-06D, the flexible group FGflock is different from the flexible group FGFlock, which was in the previous version of the permit, PTI 368-06C. In the VN response letter received on March 14, 2022, Mold Masters reported 2021 VOC emissions broken out according to the old flexible group. In the April 4, 2022 email from AQD, Mold Masters was asked to provide VOC emissions broken out for the current flexible group, FGFlock. No response was received. Please report 2021 VOC emissions under FGFlock per PTI 368-06D.

The emission unit EUFlockBooth5 is identified in PTI No. 368-06D. In the 2021 spreadsheet, EUFlockBooth5 emissions were not reported. Please demonstrate what 2021 VOC emissions were for EUFlockBooth5.

Please be advised that failure to respond in writing and identifying actions Mold Masters will take or has taken to resolve the cited violations may result in escalated enforcement action by the AQD. Please provide a program for compliance, as well as information related to 2021 VOC emissions for FGFlock and EUFlockBooth5 by June 3, 2022, which corresponds to 14 days from the date of this letter.

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

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring Mold Masters into compliance, please contact me at the number listed below.

Sincerely,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

Enclosure

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



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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
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LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 15, 2022

Mr. Kirk Payne, Director of Sales
Mold Masters Company
1455 Imlay City Road
Lapeer, Michigan 48446

SRN: A2809, Lapeer County

Dear Mr. Payne:

VIOLATION NOTICE

On January 31 and February 11, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was contacted by Mold Masters Company (Mold Masters) located at 1455 Imlay City Road, Lapeer, Michigan. The purpose of these contacts, through email and by telephone, was to discuss 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 368-06D, and Consent Order AQD No. 2020-19.

As a result of these discussions, staff have determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EUFlockBooth5	PTI No. 368-06D, Special Condition (SC) III 4	Failure to submit a Malfunction Abatement Plan (MAP) within 180 days from commencement of trial operation of the Regenerative Thermal Oxidizer (RTO).
EUFlockBooth5	PTI No. 368-06D, SC IV. 3; Rule 910	Failure to operate RTO in a satisfactory manner, based on VOC destruction efficiency not meeting minimum-required 95 percent (by weight), during preliminary testing.
EUFlockBooth5	PTI No. 368-06D, SC V. 2	Failure to test within 180 days from commencement of trial operation of the RTO to verify VOC destruction efficiency.
EUFlockBooth5	PTI No. 368-06D, SC V. 3	Failure to test within 180 days from commencement of trial operation of EUFlockBooth5 to verify the associated enclosure meets the definition of Permanent Total Enclosure (PTE).
EUFlockBooth5	PTI No. 368-06D, SC VII. 1	Failure to notify AQD in writing of the completion of installation or construction of the PTE and RTO.

PTI No. 368-06D, Special Condition (SC) III. 4 requires that within 180 days from commencement of trial operation of the Regenerative Thermal Oxidizer (RTO) associated with EUFlockBooth5, Mold Masters submit, implement, and maintain a malfunction abatement plan (MAP), as described in Michigan Air Pollution Control Rule 911. The commencement date of trial operation of the RTO was communicated to me today, to be February of 2021. As of February 1, 2022, AQD has not received a MAP from Mold Masters, in violation of this requirement.

PTI No. 368-06D, SC IV. 3 requires that Mold Masters not operate EUFlockBooth5 unless the RTO and associated Permanent Total Enclosure (PTE) are installed, maintained, and operated in a satisfactory manner, with satisfactory operation of the RTO including, but not limited to, a minimum volatile organic compound (VOC) destruction efficiency (DE) of 95 percent (by weight). It was reported to AQD that preliminary stack testing on January 31, 2022, resulted in a DE of 94-95 percent, and that in September 2021, a preliminary stack test resulted in a DE of 74 percent. These values do not indicate satisfactory operation of the RTO, and thus, are in violation of this condition.

The failure to operate the RTO in a satisfactory manner also constitutes a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

PTI number 368-06D, SC V. 2 requires that within 180 days from commencement of trial operation of the RTO associated with EUFlockBooth5, Mold Masters shall verify the VOC DE of the RTO by testing. Stack testing did not occur within the required 180 days, in violation of this condition.

PTI No. 368-08D, SC V. 3 requires that within 180 days from commencement of trial operation of EUFlockBooth5, the permittee shall verify that the associated enclosure meets the definition of PTE or verify capture efficiency of the enclosure by testing. Neither verification that the associated enclosure meets the definition of PTE, nor verification of the capture efficiency of the enclosure by testing were completed during the required 180 days in violation of this condition.

PTI No. 368-06D, SC VII. 1 requires that within 30 days after completion of the installation, construction, reconstruction, relocation or modification of the PTE and RTO associated with EUFlockBooth5, Mold Masters or their authorized agent shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur no later than the commencement of trial operation of the PTE and RTO associated with EUFlockBooth5. AQD has not received written notification and therefore Mold Masters is in violation of this requirement.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 8, 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

Mr. Kirk Payne
Mold Masters Company
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violations 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 P.O. Box 30242, Constitution Hall, 1st Floor South, 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.

In addition to the written response above, please provide to the AQD, Lansing District a copy of 12-month rolling calculations of individual and total hazardous air pollutants for FGFACILITY, since the RTO and PTE began operating, and 12-month rolling calculations of VOC emissions for EUFlockBooth5, since the RTO and PTE began operating.

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 violations cited above and for your cooperation in these matters. 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,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

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