



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

July 16, 2024

VIA EMAIL

Adam Fenton, CFO
National Composites, LLC
1732 Crooks Road
Troy, Michigan 48084

SRN: N0034, Shiawassee County

Dear Adam Fenton:

VIOLATION NOTICE

On January 4, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Molded Plastic Industries (MPI) located at 2382 Jarco Drive, Holt, Michigan. The purpose of this inspection was to determine MPI'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; the conditions of Permit to Install (PTI) number 131-22; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N0034-2019.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-GELCOAT, EU-SPRAYBOOTHRS1, and/or EU-MISC2382	FG-GELCOAT SC III.1 (PTI 131-22); EU-SPRAYBOOTHRS1 SC III.1 (MI-ROP-N0034-2019); EU-MISC2382 SC III.1 (PTI 131-22)	Waste containers in the storage shed located outside the facility were found uncovered. Materials were unidentifiable and therefore assumed to be waste materials from the aforementioned processes.
EU-SPRAYBOOTHRS1	SC I.1, MI-ROP-N0034-2019	VOC 12-month rolling Emission Limit Exceedances from January 2022 – November 2023
EU-MISC2382	SC I.2, PTI 131-22	VOC 12-month rolling Emission Limit Exceedances from January 2022 – November 2023

While onsite, the AQD staff documented with photographs that several waste containers stored in an outdoor shed at MPI, were left uncovered and unlabeled. All of the following waste materials are required to be stored in closed containers: All waste gelcoats and solvents used in FGELCOAT; all waste resins, catalysts, mold releases, and solvents used in EU-SPRAYBOOTHRS1; and all waste materials from EU-MISC2382. The buckets were unlabeled and therefore, the waste contents were unidentified, the AQD is citing violations of FG-GELCOAT SC III.1 (PTI 131-22); EU-SPRAYBOOTHRS1 SC III.1 (MI-ROP-N0034-2019); and EU-MISC2382 SC III.1 (PTI 131-22) as there is the potential the waste could be from any of the processes included under the aforementioned emission units.

Additionally, Volatile Organic Compound (VOC) Emission Limits under EU-SPRAYBOOTHRS1 and EU-MISC2382 were exceeded. The AQD reviewed the Excel spreadsheet records for both Emission Units.

EU-SPRAYBOOTHRS1

EU-SPRAYBOOTHRS1 records provided by MPI incorrectly utilized the monthly data from EU-SPRAYBOOTHGL1 to calculate monthly and thus 12-month rolling VOC emissions for EU-SPRAYBOOTHRS1. Additionally, the monthly EU-SPRAYBOOTHRS1 VOC emissions were reported in lbs; however, reporting in lbs is incorrect, as the formula used for calculating these monthly emissions clearly uses a lb to ton conversion factor. The AQD utilized the correct, monthly VOC tonnage rates from EU-SPRAYBOOTHRS1 data to create 12-month rolling VOC emission rates. The following table documents the corrected VOC emission rates and demonstrates there are a total of twenty-one, 12-month rolling periods between January 2022 and November 2023 where the VOC Emission Limit of 15.4 tons was exceeded (SC I.1, MI-ROP-N0034-2019):

12-month Rolling Period	VOC emissions (tons)	Limit (tons per 12-month rolling period)
April 2021 – March 2022	16.8	15.4
May 2021 – April 2022	18.5	
June 2021 – May 2022	26.1	
July 2021 – June 2022	30.8	
August 2021 – July 2022	31.4	
September 2021 – August 2022	35.4	
October 2021 – September 2022	35.4	
November 2021 – October 2022	35.3	
December 2021 – November 2022	39.0	
January 2022 – December 2022	43.0	
February 2022 – January 2023	56.8	
March 2022 – February 2023	61.1	
April 2022 – March 2023	58.2	
May 2022 – April 2023	62.3	
June 2022 – May 2023	64.2	
July 2022 – June 2023	63.7	
August 2022 – July 2023	67.3	
September 2022 – August 2023	69.1	
October 2022 – September 2023	74.0	
November 2022 – October 2023	76.1	
December 2022 – November 2023	78.1	

EU-MISC2382

EU-MISC2382 VOC 12-month rolling emission records from January 2022 through November 2023 indicate non-compliance with the 4.1 ton per 12-month rolling period VOC emission limit (SC I.2, PTI 131-22). The following table documents the VOC emission rates, and demonstrates there are a total of twenty-three, 12-month rolling periods between January 2022 and November 2023 where the VOC Emission Limit of 4.1 tons was exceeded.

12-month Rolling Period	VOC emissions (tons)	Limit (tons per 12-month rolling period)
February 2021 – January 2022	9.0	4.1
March 2021 -February 2022	9.4	
April 2021 – March 2022	9.6	
May 2021 – April 2022	9.6	
June 2021 – May 2022	9.7	
July 2021 – June 2022	9.6	
August 2021 – July 2022	9.9	
September 2021 – August 2022	9.9	
October 2021 – September 2022	9.3	
November 2021 – October 2022	9.9	
December 2021 – November 2022	9.5	
January 2022 – December 2022	4.8	
February 2022 – January 2023	7.8	
March 2022 – February 2023	8.1	
April 2022 – March 2023	8.0	
May 2022 – April 2023	8.1	
June 2022 – May 2023	8.2	
July 2022 – June 2023	8.1	
August 2022 – July 2023	8.1	
September 2022 – August 2023	7.9	
October 2022 – September 2023	7.2	
November 2022 – October 2023	7.1	
December 2022 – November 2023	6.8	

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 6, 2024, (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 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 Michelle Luplow at EGLE, AQD, Lansing District, at 525 West Allegan, First Floor South, Lansing, Michigan 48933 or LuplowM1@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If MPI 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.

Adam Fenton
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Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of MPI. 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,

A handwritten signature in blue ink, appearing to read "Michelle Luplow", with a long horizontal flourish extending to the right.

Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-294-9294

cc: John Mason, National Composites
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE
Gary Schwerin, EGLE