



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

September 27, 2023

Peter Hledin
Douglas Marine Corporation
6780 Enterprise Drive
Douglas, Michigan 49406

SRN: N1263, Allegan County

Dear Peter Hledin:

VIOLATION NOTICE

On July 18, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Douglas Marine Corporation located at 6780 Enterprise Drive, Douglas, Michigan. The purpose of this inspection was to determine Douglas Marine Corporation 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 69-86B;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFIBERGLASS	Special Condition 2.3	Special Condition 2.3 limits production resins used in FGFIBERGLASS to not more than 4.0% VOC content by weight. The Safety Data Sheet (SDS) of the RCI Dion 33434 showed that the material had a styrene content of 48.5% by weight. This would put the material over the VOC content limit for production resins.
FGFIBERGLASS	Special Condition 2.4	Special Condition 2.4 limits tooling resins used in FGFIBERGLASS to not more than 48% VOC by weight. The PolyLite RCI Tooling #33540-00 Resin SDS showed that the material had a styrene content 40-50% by weight and an MMA content of 2% by weight. Using worst-case high-end values the tooling resin is above the allowed 48% VOC content by weight.

FGFIBERGLASS	Special Condition 2.12	The facility had made substitutions to a few different materials that are used in FGFIBERGLASS. These substitutions occurred without correctly identifying the new material and tracking the amounts of each new material used in the operation. The materials that are not correctly identified in records were RCI Dion 33434, White Gel Coat #120WK744, Derakane 224768, Derakane 104042, Derakane 692811
--------------	------------------------	--

During this inspection, Douglas Marine Corporation was unable to produce accurate emission records.

This is a violation of the recordkeeping specified in Special Condition 2.12 of PTI number 69-86B.

The conditions of PTI number 69-86B require the permittee to keep information on the identity and amount of each material used (resin, gelcoat, curing agent, filler).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 18, 2023 (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 Cody Yazzie at EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 or YazzieC@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Douglas Marine Corporation 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.

Peter Hledin
Douglas Marine Corporation
Page 3
September 27, 2023

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Douglas Marine Corporation. 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 black ink that reads "Cody Yazzie". The signature is written in a cursive, flowing style.

Cody Yazzie
Environmental Engineer
Air Quality Division
269-312-2754

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Monica Brothers, EGLE

1