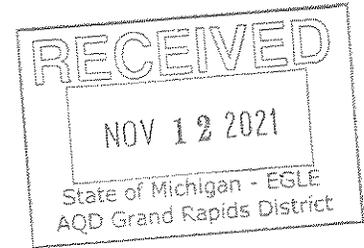




MOLDED PRODUCTS

A Division of Atlas Roofing Corporation



November 9, 2021

April Lazzaro
Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, Michigan 49503-2341

RE: Response to Violation Notice
Atlas Molded Products, a Division of Atlas Roofing Corporation
Byron Center, Michigan

Dear Ms. Lazzaro:

Atlas Molded Products (AMP), A Division of Atlas Roofing Corporation, is submitting for your review the following response to the October 14, 2021, Violation Notice issued by the Michigan Department of Environment, Great Lakes, and Energy (MDEGLE) Air Quality Division. The Violation Notice resulted from a review of the Semi-Annual Compliance Report submitted for the first half (January-June) of 2021.

Atlas Molded Products has reviewed the alleged violations and offers the following listed responses and corrective actions taken for each allegation:

1. Process Description: FGEPS, Rule/Permit Condition Violated: ROP No. MI-ROP-N1794-2017a, FGEPS, SC IV.2, Failure to operate thermal oxidizer above the minimum required temperature.

2. Process Description: FGEPS, Rule/Permit Condition Violated: ROP No. MI-ROP-N1794-2017a, FGEPS, SC III.5, Failure to meet the requirements of the Compliance Assurance Monitoring Plan.

Atlas Molded Products has operated and continues to operate the thermal oxidizer at or above the permit-required minimum combustion temperature of 1340°F. However, Atlas Molded Products had one occurrence of an employee starting the expansion process equipment without the thermal oxidizer running. This was reported to the MDGLE Air Quality Division in Atlas Molded Products' First Half 2020 semi-annual report and is summarized in Table 1.

Table 1: Alleged Violation Summary and Corrective Action

Date	ROP Emission Unit or Flexible Group ID	Performance Indicator	Duration	Cause	Corrective Action
6/28/2021	FGEPS	Combustion Temperature	57 minutes	Expander operator charged the expander EX6 and operated the expander prior to starting up the RTO and allowing the RTO to achieve the minimum combustion temperature required by the permit.	<p>Operator has been given additional training to recognize alarms and to properly operate the EXP.</p> <p>The expanders have been programed to not allow beads to be introduced when the RTO is in an alarm state. The work order for that modification is attached. Among other conditions, an alarm state is triggered when the RTO is operating below the permit-required combustion temperature.</p> <p>The RTO was replaced on November 28, 2021. The new RTO has the same functionality to enter an alarm state and prevent operation of the expanders.</p>

If you should have any questions during your review of this information, please contact me at (616) 583-1337 or by email at tvanhoeven@atlasroofing.com; or contact our environmental consultant, David Sykes, P.E., of Access Environmental Solutions, Inc., at (662) 368-1286 or by email at david.sykes@accessenvironmental.com.

Thank you for your assistance in this matter.

Sincerely,
Atlas Molded Products, a Division of Atlas Roofing Corporation

Tim Van Hoeven
 Plant Manager

