



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

December 7, 2022

Adam Fenton, VP of Sales and Marketing
Great Lakes Composite, LLC
1732 Crooks Road
Troy, Michigan 48084

SRN: N2430, Shiawassee County

Dear Adam Fenton:

VIOLATION NOTICE

On September 1, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received Great Lakes Composite's (GLC) recordkeeping in response to the recordkeeping Violation Notice sent to GLC on August 11, 2022. A records review was conducted to determine GLC's compliance with the requirements of the Renewable Operating Permit (ROP) number MI-ROP-N2430-2019b.

During the review of records, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUFOAM	MI-ROP-N2430-2019b, Material Limits SC II.1	Exceeded the Material Limit of 8,000 lbs mixed polyol/isocyanate resin two-part foam per 12-month rolling period.
FGGELCOAT	MI-ROP-N2430-2019b, Material Limits SC II.1.a	Exceeded White/Off-white gelcoat Maximum Styrene Content Limit of 31.0%
FGGELCOAT	MI-ROP-N2430-2019b, Material Limits SC II.1.c	Exceeded Pigmented gelcoat Maximum Styrene Content Limit of 40.0%

EUFOAM

During review of GLC's 2021 MAERS report, GLC reported the usage of 5,960 lbs of Elastopor P1001U isocyanate and 6880 lbs of Elastopor P15390R resin (polyol) for calendar year 2021. The total mixed isocyanate and polyol resin compounds used, as reported in MAERS, was 12,840 lbs, exceeding the 8,000 lb mixed polyol/isocyanate Material Limit per 12-month rolling basis. Also, during review of the EUFOAM records provided on September 1, 2022, the AQD noted that the material usages reported in the

2021 MAERS report were correct. Additionally, AQD noted the following Material Limit exceedances:

- May 2020 – April 2021: 8,100 lbs
- June 2020 – May 2021: 12,140 lbs
- July 2020 – June 2021: 12,140 lbs
- August 2020 – July 2021: 12,140 lbs
- September 2020 – August 2021: 12,140 lbs
- October 2020 – September 2021: 12,840 lbs
- November 2020 – October 2021: 12,840 lbs
- December 2020 – November 2021: 12,840 lbs
- January 2021 – December 2021: 12,840 lbs
- February 2021 – January 2022: 9,381 lbs
- March 2021 – February 2022: 9,381 lbs
- April 2021 – March 2022: 8,142 lbs

These exceedances are a violation of EUFOAM Material Limits, Special Condition II.1 of MI-ROP-N2430-2019b.

FGGELCOAT

During review of the calculation spreadsheets for FGGELCOAT, as well as the associated SDS of the materials used in FGGELCOAT, the AQD noted that gelcoat “HAP37 Beige BC 964-NP-589” (white/off-white gelcoat) has a styrene content of 31.36 wt%, exceeding the 31.0 wt% Material Limit for white/off-white gelcoats; and “84-810660 Lt Gray MACT Sand” (Pigmented gelcoat) has a upper styrene content of 60 wt% (range is 30 – 60%), exceeding the 40.0 wt% Material Limit for pigmented gelcoats.

These exceedances are a violation of FGGELCOAT Material Limits, Special Conditions II.1.a, and II.1.c, respectively, of MI-ROP-N2430-2019b.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 28, 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/or that 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 EGLE, AQD, Lansing District, at Constitution Hall, 525 West Allegan, Lansing District Office, First Floor South, Lansing, Michigan 48909

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and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD,
P.O. Box 30260, Lansing, Michigan 48909-7760.

If Great Lakes Composite 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 the cooperation that was extended to me during my inspection and records review of Great Lakes Composite. 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,



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

cc: John Mason, National Composites
Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Bob Byrnes, EGLE