



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

February 16, 2024

VIA EMAIL

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

SRN: A2809, Lapeer County

Dear Kirk Payne:

VIOLATION NOTICE

On February 14, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), was informed of an unsuccessful attempt to conduct stack testing at Mold Masters Company (Mold Masters) located at 1455 Imlay City Road, Lapeer, Michigan. The purpose of the stack testing was to determine 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 number 2023-03.

As a result of the attempt at sack testing, staff have determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EUFlockBooth5	Administrative Consent Order (ACO) AQD No. 2023-03, paragraph 10.A	Stack testing was not conducted within 60 days from ACO issuance.
EUFlockBooth5	PTI No. 368-06D, EUFlockBooth5, Special Condition (SC) IV.3, and Rule 910	Failure to operate an air-cleaning device in a satisfactory manner, based on volatile organic compound (VOC) destruction efficiency (DE) not meeting the minimum required 95%.
FGFacility	Rule 202	Michigan Air Emissions Reporting System (MAERS) forms for 2022 operating year were not submitted.

Kirk Payne
Mold Masters Company
Page 2
February 16, 2024

The ACO was made effective on January 4, 2023, and required completion of stack testing within 60 days of the effective date. By February 14, 2024, Mold Masters had not completed the required stack testing of EUFlockbooth5. This is a violation of the ACO AQD No. 2023-03, paragraph 10.A., which states:

“No more than sixty (60) days after the effective date of this Consent Order, the Company shall complete testing for VOC destruction efficiency and verify capture efficiency of the enclosure or that the enclosure meets the definition of a PTE for EUFlockBooth5.”

Additionally, the AQD was informed that preliminary stack testing results showed that VOC emissions were not reduced to the desired extent. This indicates a VOC DE below the minimum required 95% (by weight) in violation of PTI No. 368-06D, EUFlockBooth5, Special Condition IV.3.

This is also a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

On May 5, 2023, the AQD notified Mold Masters in a Violation Notice that a 2022 air pollution report had not been submitted for Mold Masters as required by Rule 202 of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. A copy of the May 5, 2023, letter is enclosed for your reference. At this time, we still have not received Mold Masters' MAERS reporting forms. On February 15, 2024, electronic copies of the 2021 air pollution reporting forms were emailed to you. Please print these, and hand write the 2022 values on these forms within 21 days. These forms can be mailed to the AQD Lansing District Office for entry into the new MiEnviro reporting system.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 8, 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 Daniel McGeen at EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, First Floor South, Lansing, Michigan 48909 or mcgeend@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Kirk Payne
Mold Masters Company
Page 3
February 16, 2024

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

Enclosure

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE



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LANSING DISTRICT OFFICE



AARON B. KEATLEY
ACTING DIRECTOR

May 5, 2023

VIA EMAIL

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

SRN: A2809, Lapeer County

Dear Kirk Payne:

VIOLATION NOTICE

On January 4, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), entered into Administrative Consent Order AQD No. 2023-03 (ACO) with Mold Masters Company (Mold Masters) located at 1455 Imlay City Road, Lapeer, Michigan. The purpose of this letter is to determine 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; the conditions of Permit to Install (PTI) number 368-06D; and the ACO.

The AQD has determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EUFlockBooth5	ACO AQD No. 2023-03, paragraph 10.A.	Stack testing was not conducted by March 5, 2023, 60 days from ACO issuance.
FGFACILITY	Rule 202	Michigan Air Emissions Reporting System (MAERS) forms and Supplemental Control Template (SCT) were not submitted.

Pursuant to PTI No. 368-06D, EUFlockBooth5, Special Condition V.2. and 3, Mold Masters planned to conduct VOC destruction efficiency (DE) stack testing of EUFlockBooth5 on January 31, 2023, and to verify that the associated enclosure met the definition of permanent total enclosure or verify capture efficiency of the enclosure. However, you contacted the AQD the evening of January 30, 2023, to advise that there were problems with equipment, and testing would be postponed.

Kirk Payne
Mold Masters Company
Page 2
May 5, 2023

The ACO was made effective on January 4, 2023, and required completion of stack testing within 60 days of the effective date. By March 5, 2023, Mold Masters had not completed the required stack testing of EUFlockbooth5. This is a violation of the ACO, specifically paragraph 10.A., which states:

“No more than sixty (60) days after the effective date of this Consent Order, the Company shall complete testing for VOC destruction efficiency and verify capture efficiency of the enclosure or that the enclosure meets the definition of a PTE for EUFlockBooth5.”

Additionally, the AQD was informed in a voice mail message from you on February 11, 2022, that preliminary stack testing results showed a destruction efficiency of 94-95%, below the minimum required VOC DE of 95% in PTI No. 368-06D, EUFlockBooth5, Special Condition IV.3. Because the stack testing firm was reported to be having issues with their equipment, these results could not be quality assured as accurate. Therefore, a violation of this condition is not being cited at this time.

In January 2023, the AQD, notified Mold Masters of the requirement to submit a 2022 air pollution report, with the required submittal date of March 15, 2023. In response to the non-submittal of this report, a second letter was sent on March 30, 2023, requesting immediate submittal of the Michigan Air Emissions Reporting System (MAERS) forms required pursuant to Rule 202 of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. A copy of the March 30, 2023, letter is enclosed for your reference.

At this time, we still have not received Mold Masters' MAERS reporting forms and SCT, and you are hereby notified that this constitutes a violation of the above referenced act and rule. Please submit the MAERS reporting forms and SCT within (14) days of the date of this letter.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by May 26, 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 EGLE, AQD, Lansing District, at Constitution Hall, P.O. Box 30242, 525 W. Allegan, 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.

Kirk Payne
Mold Masters Company
Page 3
May 5, 2023

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

Enclosure

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Robert Byrnes, EGLE



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GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

March 30, 2023

Mold Masters Company
1455 Imlay City Road
Lapeer, MI 48446

Dear Mold Masters Company:

SUBJECT: SRN A2809, Mold Masters Company, 1455 Imlay City Road, Lapeer

WE HAVE NOT RECEIVED SOME ASPECT OF YOUR 2022 AIR EMISSIONS REPORT.

In January 2023, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), notified you that the 2022 air emissions from your facility must be reported. The notice included information regarding the Michigan Air Emissions Reporting System (MAERS) web application, the Supplemental Control Template (SCT), and additional guidance information for both.

Emissions reporting is required pursuant to Article II: Pollution Control, Chapter 1, Point Source Pollution Control, Part 55, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), and by Air Pollution Control Rule 2 (Michigan Administrative Code R 336.202), which states:

Rule 2. The department shall require an annual report from a commercial, industrial, or governmental source of emission of an air contaminant if, in the judgment of the department, information on the quantity and composition of an air contaminant emitted from the source is considered by the department as necessary for the proper management of the air resources.

The required submittal date for the emissions report (MAERS and SCT) was March 15, 2023. Our records indicate that we have not received one or both components of the report from your facility. Act 451 identifies penalties that may be imposed on facilities that fail to report the required information. It is hereby requested that you immediately submit this information to the AQD.

If you have any questions regarding the use of the MAERS web application (<https://www.EGLE.state.mi.us/maersfacility>), review of the SCT, or the processing of your reporting forms, please email InfoMAERS@Michigan.gov. If you have questions about why you need to report, please call the Environmental Assistance Center weekdays between 8:00 a.m. and 4:30 p.m. at 800-622-9278.

Sincerely,

Annette Switzer, Director
Air Quality Division

cc: Daniel McGeen, Lansing District Office