



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION



PHILLIP D. ROOS  
DIRECTOR

November 13, 2024

VIA EMAIL

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

SRN: A2809, Lapeer County

Dear Kirk Payne:

**VIOLATION NOTICE**

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), has had intermittent communications in 2024, with Mold Masters Company (Mold Masters) located at 1455 Imlay City Road, Lapeer, Michigan. The purpose of these communications 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 these communications, staff have determined the following:

Process Description	Rule/Permit Condition Violated	Comments
EUFlockBooth5	Administrative Consent Order (ACO) AQD number 2023-03, paragraph 10 A	Stack testing was conducted within 60 days of ACO issuance.
EUFlockBooth5	PTI No. 368-06D, EUFlockBooth5, Special Condition (SC) IV.3, and Rule 910	Failure to operate the Regenerative Thermal Oxidizer (RTO) in a satisfactory manner, based on VOC destruction efficiency (DE) not meeting minimum-required 95 percent (by weight), during preliminary testing.

The ACO was made effective on January 4, 2023, and required completion of stack testing within 60 days of the effective date. As of the date of this letter, Mold Masters has 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."

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Additionally, the most recent preliminary stack testing results, from February 13, 2024, indicated that VOC emissions were not reduced 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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 19, 2024, (which coincides with 7 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, 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.

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 the 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

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