

STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY SAGINAW BAY DISTRICT OFFICE



DAN WYANT DIRECTOR

December 15, 2015

Mr. Duane Gohr Quantum Composites, Inc.- A. Schulman 1310 South Valley Center Drive Bay City, MI 48706

SRN: N6874, Bay County

Dear Mr. Gohr:

VIOLATION NOTICE

On November 24, 2015 and December 11, 2015, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Quantum Composites, Inc. - A. Schulman located at 1310 South Valley Center Drive, Bay City, Michigan. The purpose of this inspection was to determine Quantum Composites, Inc. - A. Schulman's 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 administrative rules and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N6874-2011.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|-----------------------|-----------------------------------|--------------------------|
| FGSMCBMC-Styrene | II.1.a. | Additive mixed at 69.67% |
| Monomer Content Limit | EUMIXERS - Styrene | Styrene content on the |
| | Monomer Content Limit 30 % | following days: |
| | | 07/15/2014 |
| | | 09/17/2014 |
| | | 11/05/2014 |
| | | 08/06/2015 |
| | | 09/28/2015 |

The conditions of ROP number MI-ROP-N6874-2011 limits the styrene monomer content of EUMIXERS to 30%. The facility mixed additives sent from their sister company at 69.67% styrene content. According to the facility this is not a normal operation and, at the time of the inspection, had initiated conversations to mitigate future exceedances.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 5, 2016 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Quantum Composites, Inc. - A. Schulman believes the above observations or statements are inaccurate or do not constitute a violation of the applicable legal requirement cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during my inspection of Quantum Composites, Inc. - A. Schulman. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely, Lina L. McCann

Gina L. McCann

Environmental Quality Analyst

Air Quality Division

989-894-6218

cc/via e-mail: Ms. Lynn Fiedler, DEQ

Ms. Teresa Seidel, DEQ

Mr. Thomas Hess, DEQ

Mr. Chris Hare, DEQ