



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



DAN WYANT
DIRECTOR

December 18, 2014

Ms. Brenda Wisniewski
Environmental Health and Safety Specialist
Plasan Carbon Composites
3195 Wilson Drive NW
Walker, Michigan 49534

SRN: P0374, Kent County

Dear Ms. Wisniewski:

VIOLATION NOTICE

On December 10, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Plasan Carbon Composites (Plasan) located at 3195 Wilson Drive NW, Walker, Michigan. The purpose of this inspection was to determine Plasan'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 Permit to Install (PTI) number 130-12.

During the inspection and subsequent records review, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Carbon Molding Process	PTI No. 130-12, EUCARBONMOLD, Special Condition II.1	Exceeded 12-month rolling material usage limit for the time period of May 2014 through October 2014.
Conveyorized Paint Line	PTI No. 130-12, EUPAINTLINE, Special Condition II.1	Exceeded the instantaneous VOC content of this primer.
Conveyorized Paint Line	PTI No. 130-12, EUPAINTLINE, Special Condition IV.3	No device installed to record cure oven temperature.
Conveyorized Paint Line	PTI No. 130-12, EUPAINTLINE, Special Condition VI.5	No records of temperature as required.

The records provided demonstrate that the actual 12-month rolling amounts of carbon composite material from the carbon molding process used for the time period ending in October 2014 was 1,078,610 m². PTI number 130-12 limits the amount of carbon composite to 735,300 m² per 12-month rolling time period. This limit was exceeded from May 2014 through October 2014.

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The instantaneous VOC content limit of the primer used in the conveyORIZED paint line process is limited to 3.4 lbs/gal minus water as applied. The reported instantaneous VOC content was 3.95 lb/gal. This exceeds the permitted limit.

Additionally, Plasan is required to have installed a continuous temperature recorder in order to be able to continuously record the temperature of the cure oven in the conveyORIZED paint line when clear coating is being applied. This was not done and no temperature records were provided.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 8, 2015 (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.

If Plasan 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 of Plasan. 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,



Jenifer M. Dixon
Senior Environmental Quality Analyst
Air Quality Division
616-356-0003

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Ms. Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ