



March 4, 2022

Ms. Jenine Camilleri
Enforcement Unit Supervisor
Lansing District Office
Michigan Department of Environment, Great Lakes & Energy
P.O. Box 30242
Constitution Hall 1st Floor South
Lansing, MI 48909-7760

Violation Notice Response Mold Masters Company, Lapeer, Michigan

Dear Ms. Camilleri:

On July 30, 2020, Mold Masters Company submitted a request to modify their Air Use Permit to Install (PTI) to add a regenerative thermal oxidizer (RTO) to Manual Booth 5 (EUManual5), which is a stand-alone booth that applies adhesion promotor prior to the floc booths.

EUManual5 is located at 1455 Imlay City Road, Lapeer and is currently permitted under PTI 368-06C; the proposed permit has been numbered PTI 368-06D. As the adhesion promotor currently in use in the booth is 100% volatile organic carbon (VOC) and hazardous air pollutant (HAP) material, construction of the RTO is scheduled to take place as soon as possible to control emissions.

Please note, the RTO installation is part of ongoing efforts by Mold Masters to significantly reduce VOC and HAP emissions through the use of control equipment.

On or around May 20, 2021 the initial test of the installed equipment (RTO) unit noticed a significant deficiency factor in the burn off rate of the RTO unit. The root cause of this malfunction was determined to be a warp in the cycling valve bed of the RTO Unit. A new cycling valve bed had to be manufactured and scheduled for install due to issues at the manufacture and Covid Related issues the new bad was installed on December 22, 2021. The RTO unit was operational during this time but at a reduced burn off rate.

After the new cycling valve bed was installed the test was scheduled for February 1, 2022. During the initial test it was determined that the RTO unit was functioning at a rate of 94.5 - 94-8% efficiency. Just below the required 95% rate.

Steps taken to date to improve the efficiency rate of burn off are:

Mold Masters contacted the manufacturer of the RTO Unit on February to determine adjustments and recommendations to improve the efficiency rate. Data from initial testing was provided to the manufacturer to February 7, 2022. Manufacturer will provide recommendation's on unit adjustments

to Mold Masters no later than March 18, 2022.

Mold Masters has also been contact with a filter specialist on filtration of the RTO and EUFlockbooth5 for recommendations on filtration adjustments to help with airflow from the booth to the RTO unit. Filtration recommendations based off readings from the RTO and EUFlockbooth 5 are due back to Mold Masters no later than March 22, 2022.

Lead time for new filters based of the recommendations from the filter manufacturer is 4-6 weeks.

With the items referenced above Mold Masters anticipates testing of the RTO Unit to happen the week May 30, 2022.

Thank you in advance for your consideration. If you have any questions or require additional information, please contact me at 810.245.4100 ext. 208.

Sincerely,

Kirk Payne

Director of Sales

Copy: Dan McGeen - EGLE

Mold Masters Company

Monthly DEQ Report

DECEMBER 2021

FGFacility

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			Total	Total	Total	Total		Total	Total	
•	2024	National malliage constant	FGFloc	EURobot	FGManual	FGFacility	CACCTCAA	FGPurge	FGTACs	
January	2021	Actual gallons used VOC lbs	560.40	83.00 166.96	567.88 465.96	1,211.27	CAS 67-64-1	100.00	in the same	Acetone (Ibs)
		HAPS lbs	1,181.05 1,018.81	2.88	1.018.81	1,813.97 2,040.50	CAS 98-56-6	100	-	Para-Chlorobenzotrifluoride (lbs)
			1,018.81	2.88	1,018.81	2,040.50	CAS 540-88-5		100	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)	_			0.14				
		91-20-3 Napthalene (lbs)		0.14 0.12	-	0.14 0.12				
		98-82-8 Cumene (lbs)		0.12	1	0.12	745			
February	2021	Actual gallons used	836.82	48.00	1,232.18	2,117.00	CAS 67-64-1	100.12	100	Acetone (lbs)
		VOC lbs	1,586.73	81.02	2,139.08	3,806.83	CAS 98-56-6		1.75	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,318.79	2.71	1,715.91	3,037.41	CAS 540-88-5	4.5 m. 20 m. 2	4.92	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		0.12						
		91-20-3 Napthalene (lbs)		0.16	-	0.16				
		98-82-8 Cumene (lbs)		0.40	a dia	0.40				
March	2021	Actual gallons used	1,052.17	34.00	132.09	1,218.26	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,695.00	30.18	218.77	1,943.95	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,314.55	0.63	170.87	1,486.05	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-				and a second discount is the economic and the first and an economic and a second an		, , ,
		91-20-3 Napthalene (lbs)	-	0.05	-	0.05				
		98-82-8 Cumene (lbs)	-	0.07		0.07				
April	2021	Actual gallons used	670.56	74.00	25.45	770.01	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,059.36	84.23	47.16	1,190.75	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	813.88	1.53	38.85	854.25	CAS 540-88-5			Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)	and the second	-	Comment of the Commen	(1) (1) (1) (1) (1)		Description of the Control of the Co		rest bacys Acceded (195)
		91-20-3 Napthalene (lbs)	-	0.09	-	0.09				
		98-82-8 Cumene (lbs)		0.15	-	0.15				
		,						191 avenue 1 m. 10		
May	2021	Actual gallons used	1,579.86	53.00	-	1,632.86	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	3,365.74	63.10	-	3,428.84	CAS 98-56-6		***	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	2,913.63	0.82		2,914.45	CAS 540-88-5			Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-	A Company of the Comp					
		91-20-3 Napthalene (lbs)	-	0.07	-	0.07				
		98-82-8 Cumene (lbs)	- 10%	0.09		0.09				
June	2021	Actual gallons used	1,531.03	83.00	34.01	1,648.04	CAS 67-64-1	100.00 🖁		Acetone (lbs)
		VOC lbs	2,207.77	110.93	55.97	2,374.68	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,616.60	2.33	43.69	1,662.62	CAS 540-88-5			Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		- 1		9.7				
		91-20-3 Napthalene (lbs)	*	0.08	-	0.08				
		98-82-8 Cumene (lbs)	100	0.19	Translat Theo	0.19				
July	2021	Actual gallons used	982.08	102.08	56.79	1,140.96	CAS 67-64-1	100.00		Acetone (lbs)
		VOC lbs	1,485.60	73.10	105.74	1,664.44	CAS 98-56-6		-	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,116.50	2.10	87.28	1,205.88	CAS 540-88-5	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		- 1				The state of the s		224, , 100,000 (100)
		91-20-3 Napthalene (lbs)	managangangangangangangangangangangangang	0.08	-	0.08				
		98-82-8 Cumene (lbs)	-	0.26	-	0.26				

Mold Masters Company

Monthly DEQ Report

DECEMBER 2021

FGFacility

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			Total	Total	Total	Total		Total	Total	
			FGFloc	EURobot	FGManual	FGFacility		FGPurge	FGTACs	
August	2021	Actual gallons used	1,775.34	64.01	23.65	1,863.00	CAS 67-64-1	100.00		Acetone (Ibs)
		VOC lbs	2,754.07	57.22	42.93	2,854.22	CAS 98-56-6		•	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	2,096.75	1.18	35.08	2,133.01	CAS 540-88-5		_	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		_		rear 1		V James and Service Se		
		91-20-3 Napthalene (lbs)	- Annual Deliver Service Control of Proposition Co.	0.10	- Carlo Constitution and Carlo Constitution a	0.10				
		98-82-8 Cumene (lbs)		0.13		0.13				
September	2021	Actual gallons used	772.37	73.54	18.63	864.55	CAS 67-64-1	100.00		Acetone (lbs)
		VOCIbs	1,507.01	63.17	43.12	1,613.30	CAS 98-56-6		1.7	5 Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,265.90	1.43	38.28	1,305.61	CAS 540-88-5		4.9	2 Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-				way the Windows Line Land Washington Co.		
		91-20-3 Napthalene (lbs)	And the second second second second second	0.15	-	0.15				
		98-82-8 Cumene (lbs)		0.17	-	0.17				
		• •								
October	2021	Actual gallons used	1,184.74	63.00	18.95	1,266.69	CAS 67-64-1	100.12		Acetone (lbs)
		VOC lbs	1,569.11	55.10	35.37	1,659.58	CAS 98-56-6	100		Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,091.44	1.32	24.66	1,117.42	CAS 540-88-5		_	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		-		,		502000 0020 000 000 00 00 00 000		
		91-20-3 Napthalene (lbs)	** A TANK TO THE PARTY OF THE P	0.07		0.07				
		98-82-8 Cumene (lbs)	-	0.16		0.16				
		20 02 0 00ment (1.50)		5.25		0.20				
November	2021	Actual gallons used	1,461.42	85.92	-010	1,547.34	CAS 67-64-1	100.00		Acetone (lbs)
11014111201		VOC lbs	1,980.12	100.72	45.10	2,080.83	CAS 98-56-6		100000000000000000000000000000000000000	Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	1,397.35	1.63	-	1,398.98	CAS 540-88-5		-	Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)		0.04		2,050.50	0.00.000	50000 Sec. (6-2000	2	rate but/17toctate (100)
		91-20-3 Napthalene (lbs)		0.11	New and North Propher William	0.11				
		98-82-8 Cumene (lbs)	_	0.19	_	0.19				
		50 02 0 comenc (155)		0123		0.25				
December	2021	Actual gallons used	1,840.26	63.59	49.18	1,953.03	CAS 67-64-1	100.00		Acetone (lbs)
Describer	2021	VOC lbs	2,726.40	82.50	88.85	2,897.75	CAS 98-56-6			Para-Chlorobenzotrifluoride (lbs)
		HAPS lbs	2,026.41	3.08	72.46	2,101.96	CAS 540-88-5	1000		Tert-butyl Acetate (lbs)
		67-64-1 Acetone (lbs)	2,020.12	-	72.70	-,	G G 5 10 00 5	2.4.00.00.00.2.4.00.00.20		Tere buty! Acctate (185)
		91-20-3 Napthalene (lbs)		0.03	Aparila (Sama Wan apalan)	0.03				
		98-82-8 Cumene (lbs)		0.18	_	0.18				
		DO DE O CUITICHE (100)		0.10		0.20				
	Rolling 12	Actual gallons used (yr)	14,247.05	827.14	2,158.81	17,233.01	CAS 67-64-1	1,200.27		Acetone (lbs yr)
		VOC lbs (yr)	23,117.96	968.23	3,242.95	27,329.14	CAS 98-56-6		3.4	9 Para-Chlorobenzotrifluoride (lbs yr)
Sepherman	-	HAPS lbs (yr)	17,990.61	21.64	3,245.89	21,258.13	CAS 540-88-5			5 Tert-butyl Acetate (lbs yr)
		67-64-1 Acetone (lbs yr)	17,550.01	0.17	5,2-15.05	,05	CAS 67-64-1	0.60	3.0	Acetone (tpy)
		91-20-3 Napthalene (lbs yr)	-	1.13	72010 ANNALY 2000 (1976)	1.13	CAS 98-56-6	0.00	0.0	200427
1		98-82-8 Cumene (lbs yr)		2.11		2.11	CAS 540-88-5		0.0	
		VOC (tpy)	11.56	0.48	1.62	13.66	CNS 340-00-3		, 0.0	o Terributy Acetate (tpy)
		HAPS (tpy)	9.00	0.48	1.62	10.63				
	the state of the s	67-64-1 Acetone (tpy)	9.00	0.01	1.02	10.02				
	KOIIIIR TZ	07-04-1 Acetolie (thy)	THE PARTY AND THE PARTY AND THE	0.00	The Salation of	Control of the Control				