



August 6, 2024

Michelle Luplow
Michigan Department of the Environment, Great Lakes and Energy
Air Quality Division
Lansing District Office
525 West Allegan, First Floor South,
Lansing, Michigan 48933-1502

Violation Notice dated July 16, 2024
National Composites - Molded Plastic Industries, Inc. (MPI);
SRN: N0034, Shiawassee County

Dear Ms. Luplow:

As noted in the Violation Notice, the inspection was conducted on January 4th, 2024, and the violation notice issued on July 16th, 2024. After the inspection, the responsible official vacated his position on March 20th at Molded Plastic Industries, Inc. (MPI) without notice to National Composites.

National Composites Leadership has been actively engaged with the MPI team to maintain its operational compliance while seeking to hire a new Operations Director. A new Director has been hired and has begun our on-boarding process on June 11th as a new responsible official to under the facility's compliance obligations.

Comments (or Inspector) Observations

1. Waste containers in the storage shed located outside the facility were found uncovered. Materials were unidentifiable and therefore assumed to be waste materials from the aforementioned processes.

During this transition period end of March to present date, our Leadership team has been actively identifying, correcting, and training the MPI team regarding the Hazardous Waste Storage Area. Two weeks ago, we captured these photos of the area of concern.



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2. VOC 12-month rolling Emission Limit Exceedances from January 2022 – November 2023 for EU-SPRAYBOOTHRS1

As we discussed after our receipt of the violation notice, there was approximately 121,000 lbs resin used in 2023 in the open molding booth, and when applying the calculated 4W organic HAP emission of 83.5 lbs per Ton of resin, the estimated HAP (or VOC) emission for 2023 should be approximately 5,000 lbs or 2.5 tons.

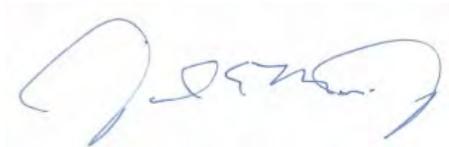
3. VOC 12-month rolling Emission Limit Exceedances from January 2022 – November 2023 for EU-MISC2382

Miscellaneous Solvents (i.e. Mold releases, et.al.) should follow (or rise and fall) with the annual rates of emissions for gelcoat, open molding, and closed molding material usages. It is suspected that the 12-month rolling averages in the prior years were double-counted in the reconciliation process for creating a new workbook from either calendar 2021 or 2022 workbooks.

To reconcile the administrative issues with the 12-month rolling average identified in comments 2 and 3, we are requesting 30 days to review and resubmit this information for the State's review. Our plan would be to submit the updated workbooks by no later than September 6th, 2024.

If you have any questions or require additional information, please contact me at 248.257.0323 or jmason@nationalcomposites.com.

Sincerely,



John E. Mason, Jr.
EHS Director

cc: Jenine Camilleri, Enforcement Unit Supervisor, EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760
Jason Beard, Chief Manufacturing Officer, National Composites
Matt Lefurgey, Operations Director, Molded Plastic Industries