



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
GRAND RAPIDS DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

March 20, 2020

Mr. Michael Westbrook
Shape Corporation
1900 Hayes Street
Grand Haven, Michigan 49417

SRN: N1185, Ottawa County

Dear Mr. Westbrook:

VIOLATION NOTICE

On March 9, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), met with staff from Shape Corporation, located at 1900 Hayes Street, Grand Haven, Michigan. The purpose of this meeting was to address issues identified in a notification letter received by the AQD on February 18, 2020 in order to determine Shape Corporation'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 Air Pollution Control Rules; and Permit to Install (PTI) number 97-17B.

| Process Description | Rule/Permit Condition Violated | Comments |
|-----------------------------|------------------------------------------------------------|--------------------------------------|
| Pultrusion line curing oven | PTI No. 97-17B, FG-Bumpers, Special Condition (SC) VIII.5. | Improper Stack Height for SV-Oven007 |

Permit to Install No. 97-17A required the exhaust stacks for ovens six (006) and seven (007) to be increased to 52.5-feet and PTI No. 97-17B required the exhaust stacks to be 57.5-feet, prior to increasing pultrusion production limits. On February 18, 2020, EGLE received notification from Shape Corporation that the facility had discovered that the wrong exhaust stack had been previously raised and that stacks SV-Oven006 and SV-Oven007 were still at original heights of 35-feet. Using the ovens for pultrusion in this manner is a violation of the stack height requirements specified in FG-Bumpers, SC VIII.4 and VIII.5 of PTI No. 97-17B. Although both oven stacks were not at the correct height, only oven seven (007) has been operated for pultrusion and the stack heights are only required to be at 57.5-feet if the oven is being operated for pultrusion under PTI No. 97-17B.

Mr. Westbrook
Shape Corporation
Page 2
March 20, 2020

Shape Corporation has already implemented corrective action. The exhaust stacks were raised to the correct heights of 57.5-feet. Stack SV-Oven006 was raised on February 14, 2020 and stack SV-Oven007 was raised on February 3, 2020. A response to this violation notice is not required.

If Shape Corporation believes that the above 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 violation cited above. If you have any questions regarding the violation please contact me at the number listed below.

Sincerely,



Chris Robinson
Environmental Quality Analyst
Air Quality Division
616-356-0259

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE