



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 21, 2021

VIA E-MAIL

Mr. Bradley Lawrence
HSE Engineer
Webasto Roof Systems, Inc.
2700 Product Drive
Rochester Hills, Michigan 48309

SRN: N1276, Oakland County

Dear Mr. Lawrence:

VIOLATION NOTICE

On September 13, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Webasto Roof Systems, Inc. located at 2700 Product Drive, Rochester Hills, Michigan. The purpose of this inspection was to determine Webasto Roof Systems' (Webasto) 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 the conditions of Permit to Install (PTI) number 84-05 and 84-05A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFACILITY	PTI No. 84-05, SC 3.3, SC 3.4	Facility did not properly calculate the HAP emissions from the process. The calculated emissions did not match the processes or the material usages at the facility. Therefore, compliance with emission limits could not be verified.
FG-POLYPRESSES	PTI No. 84-05A, SC VI.1, VI.3	Facility did not properly calculate the VOC emissions from the processes. The calculated emissions did not match the processes or the material usages at the facility. Therefore, compliance with emission limits could not be verified.

FG-POLYPRESSES	PTI No. 84-05A, SC VII.1	Facility did not appear to have submitted a notification of the completion of the installation within 30 days after the completion of the installation of the poly presses.
FG-POLYPRESSES	R336.1201	Facility appears to have installed and operated the five poly press processes prior to obtaining the permit to install.
Glass lines G4 and G5	R336.1290	Facility did not properly complete and submit the VOC emission calculations from Glass lines G4 and G5 which were claimed to be exempt from permit to install requirements pursuant to R336.1290.
Final Assembly lines	R336.1201	Facility did not properly complete and submit the VOC emission calculations from the use sealants in the final assembly lines and the use of cleaning solvents prior to packaging.

During this inspection, it was noted that Webasto had installed and commenced operation of five poly press units at this facility prior to obtaining the permit to install 84-05A. The AQD staff advised Webasto on September 17, 2021, that this is a violation of Rule 201 of the administrative rules promulgated under Act 451.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 12, 2021 (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.

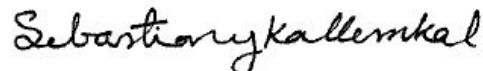
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Please submit the written response to EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Webasto 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 September 13, 2021. 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,



Sebastian G. Kallumkal
Environmental Quality Specialist
Air Quality Division
586-201-0175

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