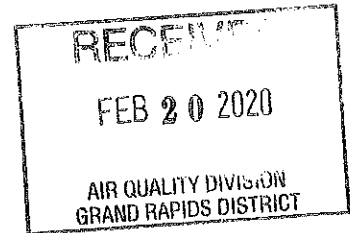




MOLDED PRODUCTS

A Division of Atlas Roofing Corporation



2/18/2020

April Lazzaro
Senior Environmental Quality Analyst
Michigan Department of Environment, Great Lakes, and Energy
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, Michigan 49503-2341

RE: Response to Violation Notice
Atlas Molded Products, a Division of Atlas Roofing Corporation
Byron Center, Michigan

Dear Ms. Lazzaro:

Atlas Molded Products (AMP), A Division of Atlas Roofing Corporation, is submitting for your review the following response to the January 29, 2020, Violation Notice issued by the Michigan Department of Environment, Great Lakes, and Energy (MDEGLE) Air Quality Division. The Violation Notice resulted from alleged noncompliance with the Renewable Operating Permit (ROP) N1794-2017a observed during your December 17, 2019, on-site inspection of our facility located at 8240 Byron Center Avenue SW in Byron Center, Michigan.

Atlas Molded Products has reviewed the alleged violations and offers the following listed responses and corrective actions taken for each allegation:

1. Process Description; FGEPS, Rule/Permit Condition Violated: ROP No. MI-ROP-N1794-2017a, FGEPS, Special Condition (SC) II.3. Failure to properly calculate materials and emissions pursuant to the equation.

Atlas Molded Products has calculated materials and emissions pursuant to the equation shown in ROP No. MI-ROP-N1794-2017a, FGEPS, Special Condition (SC) II.3. An error was discovered in the emissions calculation Excel spreadsheet where the thermal oxidizer destruction efficiency was entered as 99.4% instead of the correct value of 99.23% based on the most recent stack test conducted in 2017. This error was corrected and a revised emissions spreadsheet was emailed to April Lazzaro on January 8, 2020, and is provided here as **Attachment 1**.

On October 8, 2008, Falcon Foam, A Division of Atlas Roofing Corporation, submitted to the MDEGLE Air Quality Division a sampling and analysis plan detailing the procedures used to determine raw material and finished good VOC content as required by MI-ROP-N1794-2007a, FGEPS V.2. That VOC analysis showed that the overall highest emitting bead was the bead whose pentane percentage (percentage of the original bead pentane content) lost during expansion (referred to as P_E in the 2007 and 2017 operating permits) was 26.7% and whose pentane percentage retained in the finished product (referred to as P_W in the 2007 and

2017 operating permits) was 31.6%. This value has been used as a standard percentage of original pentane content emitted at expansion and a standard percentage of original pentane retained in all finished good as they are considered the "worst case" values in terms of overall emissions and allow for conservative emission factors for use across all finished good production.

2. Process Description; FGEPS, Rule/Permit Condition Violated: ROP No. MI-ROP-N1794-2017a, FGEPS, SC V.5, and V.7. Failure to determine VOC content of product as shipped on an annual basis for the past three years.

On October 8, 2008, Falcon Foam, A Division of Atlas Roofing Corporation, submitted to the MDEGLE Air Quality Division a sampling and analysis plan detailing the procedures used to determine raw material and finished good VOC content as required by MI-ROP-N1794-2007a, FGEPS V.2. The submitted VOC sampling and analysis plan was approved and accepted by the MDEGLE Air Quality Division. Atlas Molded Products has operated from October 8, 2008 forward with the understanding that the October 8, 2008 VOC sampling and analysis plan remained valid and was in compliance with MI-ROP-N1794-2007a FGEPS V.2.

Atlas Molded Products understood that the October 8, 2008, VOC sampling and analysis plan continued and was in compliance with MI-ROP-N1794-2017a, FGEPS, Permit Condition SC V.7 which states: "The permittee shall conduct the required sampling and analysis outlined in SC V.5 and SC V.6 on an annual basis or on an alternate sampling schedule or analysis approved by the AQD District Supervisor." That understanding was based on past confirmations from former permitting contact Cal Peters and on communications detailed in the October 3, 2016, MDEGLE Air Quality Division Renewable Operating Permit Staff Report.

Atlas Molded Products submitted an updated VOC sampling plan for review and approval to the MDEGLE Air Quality Division District Supervisor on February 8, 2020, as required by ROP-N1794-2017a, FGEPS, SC V.7. A copy is included here as **Attachment 2**. After approval of the VOC analysis plan, Atlas Molded Products will complete and submit the finished plan to the MDEGLE Air Quality Division.

3. Process Description; FGEPS, Rule/Permit Condition Violated: ROP No. MI-ROP-N1794-2017a, FGEPS, SC V.6, and V.7. Failure to determine VOC content of regrind / densified scrap on an annual basis for the past three years.

On October 8, 2008, Falcon Foam, A Division of Atlas Roofing Corporation, submitted to the MDEGLE Air Quality Division a sampling and analysis plan detailing the procedures used to determine raw material and finished good VOC content as required by MI-ROP-N1794-2007a, FGEPS V.2. The submitted VOC sampling and analysis plan was approved and accepted by the MDEGLE Air Quality Division. Atlas Molded Products has operated from October 8, 2008 forward with the understanding that the October 8, 2008 VOC sampling and analysis plan remained valid and was in compliance with MI-ROP-N1794-2007a FGEPS V.2.

Atlas Molded Products understood that the October 8, 2008, VOC sampling and analysis plan continued and was in compliance with MI-ROP-N1794-2017a, FGEPS, Permit Condition SC V.7 which states: "The permittee shall conduct the required sampling and analysis outlined in SC V.5 and SC V.6 on an annual basis or on an alternate sampling schedule or analysis approved by the AQD District Supervisor." That understanding was based on past confirmations from former permitting contact Cal Peters and on communications detailed in the October 3, 2016, MDEGLE Air Quality Division Renewable Operating Permit Staff Report.

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4. Process Description; FGEPS, Rule/Permit Condition Violated; ROP No. MI-ROP-N1794-2017a, FGEPS, SC VI.8, Failure to conduct recordkeeping as required in Appendix 3.

Atlas Molded Products has calculated materials and emissions pursuant to the equation shown in ROP No. MI-ROP-N1794-2017a, FGEPS, Special Condition (SC) VI.8. An emissions spreadsheet was emailed to April Lazzaro on January 8, 2020, and is provided here as **Attachment 1**.

5. Process Description; FGEPS, Rule/Permit Condition Violated; ROP No. MI-ROP-N1794-2017a, General Condition 10, Failure to properly operate thermal oxidizer.

Atlas Molded Products has operated and continues to operate its processing and emissions control equipment as designed and specified by our internal operating policies, procedures, and practices and the manufacturers' recommendations. Atlas Molded Products strongly disagrees with this alleged violation and with the assumptions based on visual observations documented in the Scheduled Inspection Report issued along with the Violation Notice on January 29, 2020. Specifically, Atlas Molded Products disagrees with the observation of a "lack of maintenance of the (thermal oxidizer) unit and improper operation" documented as Item #2 of the "Summary of Conference Call January 8, 2020."

Atlas Molded Products is providing here as **Attachment 3** an external service report issued from Oxidizers, Inc., on November 24, 2019, detailing the findings from their onsite inspection of the thermal oxidizer at the Atlas Molded Products facility. This report does not indicate a lack of maintenance nor improper operation of the thermal oxidizer. Rather, it confirms that Atlas Molded Products has operated and continues to operate the thermal oxidizer correctly. As noted in Item #2 of your "Summary of Conference Call January 8, 2020," the annual inspection recommended adding media as soon as possible. That inspection report was issued on November 24 and the media was added on December 12. Since the thermal oxidizer is not constructed of stainless steel, rust and corrosion could occur. Atlas Molded Products makes necessary repairs any time that rust and corrosion present the potential to affect the performance of the thermal oxidizer. Areas of steel replacement can be visually observed.

6. Process Description: FGEPS, Rule/Permit Condition Violated; ROP No. MI-ROP-N1794-2017a, FGEPS, SC IV.2, Failure to operate thermal oxidizer above the minimum required temperature.

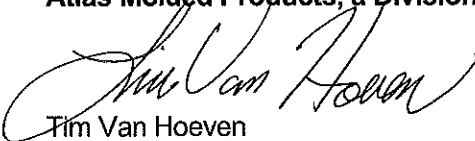
Atlas Molded Products has operated and continues to operate the thermal oxidizer at or above the permit-required minimum combustion temperature of 1340°F. Atlas Molded Products had one occurrence of the thermal oxidizer shutting down and this was reported to the MDEGLE Air Quality Division on Atlas Molded Products' 2019 semi-annual report. At no other times was the process operating and were VOC emissions being sent to the thermal oxidizer when when the thermal oxidizer combustion temperature was below 1340°F. Atlas Molded Products has added comments to the previously submitted temperature chart records to explain the temperature changes further and to confirm that the thermal oxidizer is operating as designed. These are included as **Attachment 4**.

If you should have any questions during your review of this information, please contact me at (616) 583-1337 or by email at tvanhoeven@atlasroofing.com; or contact our environmental consultant, David Sykes, P.E., of Access Environmental Solutions, Inc., at (662) 368-1286 or by email at david.sykes@accessenvironmental.com.

Thank you for your assistance in this matter.

Sincerely,

Atlas Molded Products, a Division of Atlas Roofing Corporation

A handwritten signature in black ink, appearing to read "Tim Van Hoeven". The signature is written in a cursive style with a large initial "T".

Tim Van Hoeven
Plant Manager

Cc: Jenine Camilleri
Enforcement Unit Supervisor
MDEGLE Air Quality Division
P.O. Box 30260
Lansing, Michigan 48909-7760