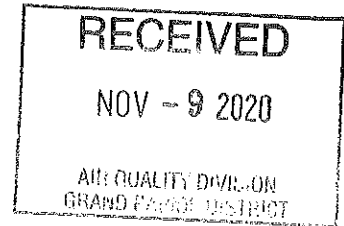




MOLDED PRODUCTS

A Division of Atlas Roofing Corporation



November 6, 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: Notice of Violation Response and Supplemental Information
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 Notice of Violation (NOV) issued on October 16, 2020, to our facility located at 8240 Byron Center Avenue SW in Byron Center, Michigan.

The NOV was issued for alleged violations of certain terms and conditions of Renewable Operating Permit (ROP) MI-ROP-N1794-2017a related to a temporary malfunction of the pollution control device (Permit Unit ID EURTO) controlling VOC emissions from the Emissions Group FGEPS. This malfunction occurred from Wednesday, September 23, at 11:12pm EST., until September 24, 2020, at 6:10am EST, when the pollution control device was brought back online and returned to performing as required.

Pursuant to Rule 336.1912, AMP submitted an initial email notification to the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), on September 25, 2020, and then a full written report on October 8, 2020.

As requested in the NOV, AMP is submitting for your review the following information to supplement your investigation:

- Weekly visual inspection of gas regulators, chamber refractory, signal strengths, burner, flame appearance, and signs of leaks, deterioration, damage or developing problems for the past 6 months.

The requested inspection records are included as Attachments A and B. However, not all inspections were performed on a weekly basis. AMP will submit a revised Compliance Assurance Monitoring (CAM) that will include a more feasible schedule that will ensure future compliance.

Inspection	Actual Schedule	Performed By	Location
Gas regulators	Weekly	AMP	Attachment A
Chamber refractory	Annually (requires complete shutdown/ cooldown of RTO)	Oxidizers, Inc.	Attachment B
Signal strengths	Annually	Oxidizers, Inc.	Attachment B
Burner	Annually (requires complete shutdown/ cooldown of RTO)	Oxidizers, Inc.	Attachment B
Flame appearance	Annually	Oxidizers, Inc.	Attachment B
Signs of leaks, deterioration, damage, or developing problems	Weekly	AMP	Attachment A

- The most recent semiannual inspection of igniter, verifying electrode condition and proper gap, and ceramic fiber lining.

This information is provided in the inspection report prepared by Oxidizers, Inc., to document their inspection of the RTO performed on July 22, 2020. The inspection report is included as Attachment B.

- The most recent semiannual verification of interlocks and fuel valves.

This information is provided in the inspection report prepared by Oxidizers, Inc., to document their inspection of the RTO performed on July 22, 2020. The inspection report is included as Attachment B.

- The most recent annual calibration of RTO temperature control.

This information is provided in the inspection report prepared by Oxidizers, Inc., to document their inspection of the RTO performed on July 22, 2020. The inspection report is included as Attachment B.

- The most recent annual check of flame control, burner, high and low temperature alarms and shut-off.

This information is provided in the inspection report prepared by Oxidizers, Inc., to document their inspection of the RTO performed on July 22, 2020. The inspection report is included as Attachment B.

- Weekly inspection of valves, piping, control valves, signal strengths, motors, and linkages for the past 6 months.

This information is included as Attachment C. The records include maintenance history documented in MaintScape, our electronic maintenance scheduling and tracking software.

- Monthly inspections of the damper plate seals and verification of actuator functionality for the past 6 months.

AMP tests the dampers on the condenser leading to the RTO. These actuators are on an inspection plan and a test procedure was created to test them. The dampers are only replaced if damaged. The other dampers are the dampers that control the flow of air through the RTO. There is currently no test procedure for these dampers. Limiting these dampers would restrict airflow and possibly create faults. AMP has replaced one faulty damper in the past year.

- Confirmation of damper replacement for past 4 quarters.

The recirculation damper control was replaced in August 2019 under Work Order #325802.

- The most recent semiannual inspection and report of lubrication of damper and fan bearings.

This information is provided in the inspection report prepared by Oxidizers, Inc., to document their inspection of the RTO performed on July 22, 2020. The inspection report is included as Attachment B.

- The most recent semiannual reports of calibration of pressure sensor, sending device and verification of interlocks.

This information is provided in the inspection report prepared by Oxidizers, Inc., to document their inspection of the RTO performed on July 22, 2020. The inspection report is included as Attachment B.

- Thermal oxidizer temperature records for the month of September and October (to date) 2020.

This information is provided as Attachment D.

- Anticipated date of new impeller installation, or date of installation if it has been completed.

Impeller was balanced August 28, 2020. New impeller is now in stock and will be replaced if we have further issues.

November 6, 2020

As requested, AMP is developing a Preventative Maintenance/Malfunction Abatement Plan to prevent, detect, and correct malfunctions or equipment failures, and will submit that plan under a separate cover before November 25, 2020. At that time, AMP will submit a revised CAM Plan that we believe better matches the current design and operation of the RTO than the current CAM Plan that was first developed in 2006.

AMP accepts responsibility and continues to investigate improvements to prevent this event from reoccurring. The solutions that we have implemented will ensure that the same failure will not be repeated. Continued preventative service will be performed on the RTO to ensure compliance with the requirements of the ROP.

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

Tim Van Hoeven
Plant Manager

A handwritten signature in cursive script that reads "Tim Van Hoeven". The signature is written in black ink and is positioned below the typed name and title.