



MOLDED PRODUCTS

A Division of Atlas Roofing Corporation



September 21, 2022

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 September 15, 2022, 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 September 15, 2022, Violation Notice issued by the Michigan Department of Environment, Great Lakes, and Energy (MDEGLE) Air Quality Division.

Atlas Molded Products has reviewed the alleged violation and offers the following listed response and corrective actions taken for the allegation:

- *PTI No. 82-21A, Special Condition V.5. Failure to conduct emissions testing on EUMOLD8 within 180 days after commencement of trial operation.*

AMP contracted with Alliance Technical Group, LLC, to perform the EUMOLD8 testing. A test date of August 24, 2022, was chosen and a test plan was submitted by AMP's environmental consultant, David Sykes of Access Environmental Solutions, Inc., to MDEGLE for approval. After submittal of the test plan, it was learned that Alliance would not be available on August 24, 2022, and it was proposed to MDEGLE that the date be changed to August 17, 2022. An MDEGLE witness was not available to attend the proposed August 17, 2022 test date so Alliance, AMP and MDEGLE agreed to move the test date to August 18, 2022.

On August 9, 2022, AMP was informed by MDEGLE that, the use of a pentane response factor would not be allowed, and instead a full scale field calibration of the flame ionization detector (FID) using a certified pentane calibration gas would be required. Since this had not been required in other jurisdictions, Alliance did not have the calibration gas needed to perform the FID test.

A conference call was held on August 9, 2022, with MDEGLE, AMP, Alliance, and Access Environmental Solutions. During the call, Alliance expressed its disagreement with

MDEGLE's test method requirements as well as its inability to locate and purchase the required calibration gas. Considering the uncertainty with the selection of test methods, and the difficulty in acquiring the calibration gas, AMP was forced to postpone the test until Alliance and MDEGLE could come to agreement on the test method and Alliance could obtain the calibration gas. Otherwise, AMP was ready to proceed with the test and had made all other necessary arrangements.

Alliance has now located and purchased the calibration gas, a new test date of October 18, 2022, has been chosen, and a revised test plan was submitted to MDEGLE on September 14, 2022.

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 Hoven
Plant Manager

