



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



GRETCHEN WHITMER  
 GOVERNOR

LIESL EICHLER CLARK  
 DIRECTOR

June 7, 2022

Tim Van Hoeven  
 Atlas EPS, a Division of Atlas Roofing Corporation  
 8240 Byron Center Road  
 Byron Center, Michigan 49315

SRN: N1794, Kent County

Dear Tim Van Hoeven:

**VIOLATION NOTICE**

On April 28, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Atlas EPS, a Division of Atlas Roofing Corporation (Atlas EPS) located at 8240 Byron Center Road, Byron Center, Michigan. The purpose of this inspection was to determine Atlas EPS'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; the conditions of Permit to Install (PTI) number 82-21A; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N1794-2017a.

During the inspection, staff observed the following:

| Process Description           | Rule/Permit Condition Violated  | Comments  |
|-------------------------------|---|---|
| FGEPS                         | PTI No. 82-21A,<br>Special Condition I.1 and<br>MI-ROP-N1794-2017a,<br>Special Condition I.1    | Daily limit of 272.4 lb/hr VOC was exceeded on 18 separate days   |
| FGEPS                         | PTI No. 82-21A,<br>Special Condition V.1<br>and<br>MI-ROP-N1794-2017a,<br>Special Condition V.1 | Failure to submit test report within 60 days following the last date of the test  |
| FGEPS                         | PTI No. 82-21A,<br>Special Condition II.3 and<br>MI-ROP-N1794-2017a,<br>Special Condition II.3  | Failure to calculate the production weighted average fraction VOC retained in product and failure to update pentane retention based on PTI application data |
| Facility wide MAERS submittal | Rule 2  | Failure to submit complete MAERS report   |
| EUCUTTING                     | Rule 201  | Operating without a Permit to Install   |

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On March 23, 2022, AQD staff observed stack testing at Atlas EPS. The permit requires that the facility submit a complete test report within 60 days following the last date of the test. As of June 7, 2022, that report has not been received as required.

During the previous inspection conducted on December 17, 2019, Atlas EPS was cited for failure to properly calculate materials and emissions pursuant to the equation contained in the permit. A review of the calculations and emissions data finds that Atlas EPS has not corrected all issues related to recordkeeping. Specifically, the equation states that  $P_w$  = Production-weighted average fraction of VOC retained in product. "Production-weighted average fraction of VOC retained in product" means the average fraction of VOC contained in the raw beads that is retained in the product shipped from the facility for each month's production. This average is determined by dividing the VOC content of each product by the VOC content of the respective raw beads and weighting this ratio by the fraction, by weight, of the month's production that the product constitutes. Atlas EPS is not using the production weighted average fraction of VOC in the calculation, but an average of VOC retained based on the product sampling results which is incorrect.

In December 2021 and January 2022, during the permitting process for PTI No. 82-21A, Atlas EPS changed the distribution of pentane loss, based on updated process information. However, these changes were not incorporated into the emissions calculations. Specifically, pentane loss from the expander was formerly assumed to be 17% and is now 13.2% which leads to an increase in actual emissions when the spreadsheet is adjusted to the new number.

During the inspection recordkeeping review, it was determined that emissions records for EUCUTTING were not available. In response to the AQD request, Atlas EPS committed to submitting the records by May 20, 2022. Those records demonstrating that the process is exempt from permitting have not been received. This is a violation of Rule 201.

Additionally, during the recordkeeping review, a discrepancy was identified between the emissions reported in the facility spreadsheet compared to emissions reported to the Michigan Air Emissions Reporting System. Atlas EPS committed to correcting the MAERS report by May 13, 2022. That correction has not been completed.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 28, 2022 (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, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Atlas EPS 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 Atlas EPS. 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,



April Lazzaro  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-1092

cc: Matt Cawson, Atlas EPS  
Josh Livingston, Atlas EPS  
Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Jenine Camilleri, EGLE  
Christopher Ethridge, EGLE  
Heidi Hollenbach, EGLE