



December 15, 2022

Michelle Luplow
EGLE
AQD
Lansing District,
Constitution Hall,
525 West Allegan, Lansing District Office, First Floor South,
Lansing, Michigan 48909

RE: December 7, 2022 Violation Notice

Greetings Michelle,

In review of the cited issues below, it appears that we have some remaining administrative issues with our historical recordkeeping practices that will need improvement.

EUFOAM	MI-ROP-N2430-2019b, Material Limits SC II.1	Exceeded the Material Limit of 8,000 lbs mixed polyol/isocyanate resin two-part foam per 12- month rolling period.
FGGELCOAT	MI-ROP-N2430-2019b, Material Limits SC II.1.a	Exceeded White/Off-white gelcoat Maximum Styrene Content Limit of 31.0%
FGGELCOAT	MI-ROP-N2430-2019b, Material Limits SC II.1.c	Exceeded Pigmented gelcoat Maximum Styrene Content Limit of 40.0%

EUFOAM

On investigation into foam purchases for the 2020-21 calendar years, it seems that we purchased and received more foam (parts A & B) materials than we could use due to industry wide fears in supply chain disruption. Present conditions and looking forward, we believe that will be able to comply with the 8,000 lb mixed polyol/isocyanate Material Limit per 12-month rolling basis.

FGGELCOAT

“HAP37 Beige BC 964-NP-589” was incorrectly classified as “white/off-white gelcoat” and we were advised by our consultant that it should have classified as a “pigmented gelcoat”. See attached memo file “221206 Memo LtGray Styrene content letter”.

Michelle Luplow
EGLE AQD
Page 2
December 15, 2022

FGGELCOAT

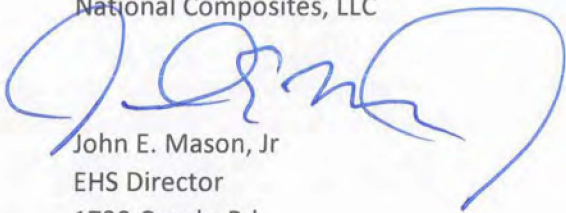
"84- 810660 Lt Gray MACT Sand" SDS indicates an overly broad range for styrene content. The Certificate of Analysis provided by the manufacturer indicates this product will comply with the 40 wt% Material Limit for pigmented gelcoats. See attached memo file "221214 Memo White and off-white gelcoats".

Moving forward, we would like to speak with you by January 15th, 2023, to review current gaps in our permit with the intent to prepare an application to address these gaps and a targeted filing date of January 31st 2023.

Thank you for your patience and understanding.

Sincerely

National Composites, LLC

A handwritten signature in blue ink, appearing to read "John E. Mason, Jr.", is written over the typed name and title.

John E. Mason, Jr
EHS Director
1732 Crooks Rd.
Troy, MI 48084

Attachments

cc: Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD,
P.O. Box 30260, Lansing, Michigan 48909-7760

John Mason

From: John Mason
Sent: Tuesday, December 6, 2022 10:36 AM
To: LuplowM1@michigan.gov
Subject: FW: [EXTERNAL]Styrene content letter
Attachments: 1040823XX Lot P423993.pdf; LYB 1040823XX 80-810660 LT Gray MACT Sand.pdf

Greetings Michelle,

David from Lyondellbasell was kind enough to provide us with the formulated styrene content for the Lt Gray MACT Gelcoat.

Unfortunately, we learned that this product will no longer be available as their production facility will be closing in the very near future. It seems that the parent company in Belgium is divesting from manufacturing of materials for thermoset plastics.

It appears getting a revised SDS is not practical, though the facility does provide our distributor Composites One with a Certificate of Analyses for each Batch produced. In the event that this product is purchased between now and the closure of their facility, would the Batch CofA be acceptable for our compliance reporting?

Best Regards~

John E. Mason, Jr., EHS Director

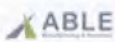
1732 Crooks Road, Troy, MI 48084

Desk: 248-257-0323

Cell: 248-980-5606

Email: jmason@nationalcomposites.com

<https://nationalcomposites.com/>



From: Guseilla, David <David.Guseilla@lyondellbasell.com>

Sent: Tuesday, December 6, 2022 9:28 AM

To: John Mason <jmason@nationalcomposites.com>

Subject: [EXTERNAL]Styrene content letter

This email originated from outside of the organization.

Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning John,

Please see attached letter we discussed yesterday reporting the formulated styrene content of Lyondellbasell 1040823XX 80-810660 Lt Gray MACT Sand as less than 31%. I have also attached the COA for the last batch of this

product we made for Comp One. Within it, you will find the actual HAP content (generally styrene and MMA content) for the individual batch. Please keep in mind we have not made this product in over a year (last batch: 11/3/21), so you may want to look into which product you have since moved to. If you need further assistance, please let me know.

Regards,
David Guseilla
Quality Manager

Information contained in this email is subject to the Disclaimer and Privacy Notice found by clicking on the following link:
<a href="<http://www.lyb.com/en/about-us/disclaimer>"><http://www.lyb.com/en/about-us/disclaimer>

John Mason

From: Kuieck, Sue <slkuiECK@fishbeck.com>
Sent: Wednesday, December 14, 2022 10:31 AM
To: John Mason
Cc: Woolley, Lillian; Adam Fenton; Diane Gagnier
Subject: [EXTERNAL]Violation Letter Response - GLC

This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi John

As we discussed, I reviewed the issues in the violation notice received by GLC related to the material content of styrene in HAP37 Beige BC 964-NP-589 and 84-810660 Lt Gray MACT Sand. The Beige gelcoat should not be designated as a white/off white gelcoat but should be considered an other pigmented. Our staff person mistakenly indicated this gelcoat was off white based on the color description. However, there is a definition for white/off white in the MACT of the following:

White and off-white gel coat means a gel coat that contains 10 percent of mc weight.

The most recent SDS I have on this gelcoat indicated 1-5% titanium dioxide. As long as you don't have data indicating a higher titanium dioxide content, the recordkeeping spreadsheet should be changed to indicate this gelcoat is not considered white/off white based on the definition above.

Also, I looked in my files and we received some confidential information for the 84-810660 Lt Gray MACT Sand indicating a lower styrene content. We initially submitted the SDS to the permit unit but they would not increase your limit to 60% without more specific data from the supplier. I provided this information to permits, but I don't believe I can give it to GLC because of the confidentiality agreement. Can I call Michelle Luplow to discuss this issue?

Let me know if you would like any assistance on the response to EGLE. Thank you!

Sue Kuieck | Air Quality Engineer

Fishbeck | w: 616.464.3721 | c: 616.446.2496 | Fishbeck.com

From: [KuiECK, Sue](#)
To: [John Mason](#)
Cc: [Lillian Woolley](#); [Adam Fenton](#); [Diane Gagnier](#)
Subject: [EXTERNAL]Violation Letter Response - GLC
Date: Wednesday, December 14, 2022 10:31:36 AM
Attachments: [image001.png](#)

**This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Hi John

As we discussed, I reviewed the issues in the violation notice received by GLC related to the material content of styrene in HAP37 Beige BC 964-NP-589 and 84-810660 Lt Gray MACT Sand. The Beige gelcoat should not be designated as a white/off white gelcoat but should be considered an other pigmented. Our staff person mistakenly indicated this gelcoat was off white based on the color description. However, there is a definition for white/off white in the MACT of the following:



The most recent SDS I have on this gelcoat indicated 1-5% titanium dioxide. As long as you don't have data indicating a higher titanium dioxide content, the recordkeeping spreadsheet should be changed to indicate this gelcoat is not considered white/off white based on the definition above.

Also, I looked in my files and we received some confidential information for the 84-810660 Lt Gray MACT Sand indicating a lower styrene content. We initially submitted the SDS to the permit unit but they would not increase your limit to 60% without more specific data from the supplier. I provided this information to permits, but I don't believe I can give it to GLC because of the confidentiality agreement. Can I call Michelle Luplow to discuss this issue?

Let me know if you would like any assistance on the response to EGLE. Thank you!

Sue KuiECK | Air Quality Engineer

Fishbeck | w: 616.464.3721 | c: 616.446.2496 | Fishbeck.com

From: [John Mason](#)
To: [Luplow, Michelle \(EGLE\)](#)
Subject: FW: [EXTERNAL]Styrene content letter
Attachments: [image001.png](#)
[1040823XX Lot P423993.pdf](#)
[LYB 1040823XX 80-810660 LT Gray MACT Sand.pdf](#)

Greetings Michelle,

David from Lyondellbasell was kind enough to provide us with the formulated styrene content for the Lt Gray MACT Gelcoat.

Unfortunately, we learned that this product will no longer be available as their production facility will be closing in the very near future. It seems that the parent company in Belgium is divesting from manufacturing of materials for thermoset plastics.

It appears getting a revised SDS is not practical, though the facility does provide our distributor Composites One with a Certificate of Analyses for each Batch produced. In the event that this product is purchased between now and the closure of their facility, would the Batch CofA be acceptable for our compliance reporting?

Best Regards~

John E. Mason, Jr., EHS Director

1732 Crooks Road, Troy, MI 48084

Desk: 248-257-0323

Cell: 248-980-5606

Email: jmason@nationalcomposites.com

<https://nationalcomposites.com/>



From: Guseilla, David <David.Guseilla@lyondellbasell.com>

Sent: Tuesday, December 6, 2022 9:28 AM

To: John Mason <jmason@nationalcomposites.com>

Subject: [EXTERNAL]Styrene content letter

**This email originated from outside of the organization.
Do not click links or open attachments unless you recognize the sender and know the content**

is safe.

Good Morning John,

Please see attached letter we discussed yesterday reporting the formulated styrene content of Lyondellbasell 1040823XX 80-810660 Lt Gray MACT Sand as less than 31%. I have also attached the COA for the last batch of this product we made for Comp One. Within it, you will find the actual HAP content (generally styrene and MMA content) for the individual batch. Please keep in mind we have not made this product in over a year (last batch: 11/3/21), so you may want to look into which product you have since moved to. If you need further assistance, please let me know.

Regards,
David Guseilla
Quality Manager

Information contained in this email is subject to the Disclaimer and Privacy Notice found by clicking on the following link: <a href="<http://www.lyb.com/en/about-us/disclaimer>"><http://www.lyb.com/en/about-us/disclaimer>