



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

September 6, 2017

Ms. Diane Gagnier
Owosso Composites LLC
401 South Delaney Road
Owosso, Michigan 48867

SRN: N2430, Shiawassee County

Dear Ms. Gagnier:

VIOLATION NOTICE

On July 19, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Owosso Composites LLC located at 401 South Delaney Road, Owosso. The purpose of this inspection was to determine 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; and the conditions of Permit to Install (PTI) number 129-16A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
PTI 129-16A - EUGELCOAT	Special Condition (SC) II.1 requires that the permittee not exceed the styrene content of 33.0% by weight for all other gelcoats. (R 336.1702(a))	Two (2) gelcoat materials used exceeded the styrene content limits according to the records submitted 8-24-2017.
PTI 129-16A - EUGELCOAT	SC VI.1 and 3 requires monthly styrene and VOC emission records. (R 336.1225, R 336.1702(a))	Recordkeeping had not been done since startup of the new facility in May of 2017.
PTI 129-16A - EUGELCOAT	SC VII.1 Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification, the permittee shall notify the AQD, in writing, of the completion of the activity. (R 336.1201(7)(a))	Notification that installation is complete should have been submitted within 30 days of startup.
PTI 129-16A - EURTM	SC VI.1 and 3 requires monthly VOC emission records. (R 336.1225, R 336.1702(a))	Recordkeeping had not been done since startup of the new facility in May of 2017.

Process Description	Rule/Permit Condition Violated	Comments
PTI 129-16A - EUADHESIVEDISPING	SC VI.1 and 3 requires monthly VOC emission records. (R 336.1225, R 336.1702(a))	Recordkeeping had not been done since startup of the new facility in May of 2017.
PTI 129-16A - EUADHESIVEDISPING	SC VII.1 Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification, the permittee shall notify the AQD, in writing, of the completion of the activity. (R 336.1201(7)(a))	Notification that installation is complete should have been submitted within 30 days of startup.
PTI 129-16A - EUCLEANUP	SC VI.1 and 3 requires monthly acetone and VOC emission records. (R 336.1224, R 336.1225, R 336.1702(a))	Recordkeeping had not been done since startup of the new facility in May of 2017.
PTI 129-16A - FGOPENMOLDING	SC IV.1 The permittee shall not operate any spray booth associated with FGOPENMOLDING unless its respective exhaust filter is installed, maintained and operated in a satisfactory manner. (R 336.1301, R 336.1331)	Operating without the exhaust filters installed and installation of the spray booths were not complete.
PTI 129-16A - FGOPENMOLDING	SC VI.1 and 3 requires monthly styrene and VOC emission records. (R 336.1225, R 336.1702(a))	Recordkeeping had not been done since startup of the new facility in May of 2017.
Small Coating Room - coating of metal fan wheels with a wax-based coating	R 336.1201 (Rule 201)	May be exempt from Rule 201, but no records had been done for a determination.

This facility is also subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR Part 63, Subparts MMMM, PPPP, VVVV, and WWWW. The recordkeeping to demonstrate compliance with these standards had not been started. The recordkeeping requirements for 40 CFR Part 63, Subparts PPPP, VVVV, and WWWW are listed in Section VI for FGMACTPPPP, FGMACTVVVV, and FGMACTWWWW on PTI 129-16A.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 27, 2017. 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.

If you believe 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. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Julie L. Brunner, P.E.
Senior Environmental Engineer
Air Quality Division
517-284-6789

JLB:TG

cc/via e-mail: Mr. Troy Dempsey, Owosso Composites
Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ