



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 11, 2022

Adam Fenton, VP of Sales and Marketing
Great Lakes Composite, LLC
1732 Crooks Road
Troy, Michigan 48084

SRN: N2430, Shiawassee County

Dear Adam Fenton:

VIOLATION NOTICE

On June 10, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Great Lakes Composite located at 401 S. Delaney Road, Owosso, Michigan. The purpose of this inspection was to determine Great Lakes Composite'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; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N2430-2019b.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|---------------------|--|--|
| EUADHESIVEDISPING | Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3 | For January 2021 – April 2022 (monthly and 12-month rolling): Identity and quantity (lbs) of each material used; VOC (including styrene) content of each material used; SDS or manufacturer's formulation data for all materials used; and VOC (including styrene) mass emission rates |
| EUFOAM | Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3 | For January 2020 – April 2022 (monthly and 12-month rolling): Monthly and 12-month rolling records of the amount of mixed polyol/isocyanate resin two-part foam used. |

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|---------------|--|--|
| EUCLEANUP | Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3 | For January 2020 – April 2022 (monthly and 12-month rolling): On a monthly basis, identification of each cleanup solvent used; quantity (in gal or lbs) of each cleanup solvent used, recovered and reclaimed; and VOC and acetone mass emissions calculations. |
| FGOPENMOLDING | Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3 | For January 2021 – April 2022 (monthly and 12-month rolling): Identity and quantity (lbs) of each material used; wt% of styrene content in each resin used; VOC (including styrene) content of each material used; VOC (including styrene) mass emission rates; and SDS for all materials used |
| FGGELCOAT | Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3 | For January 2021 – April 2022 (monthly and 12-month rolling): Identity and quantity (lbs) of each material used; wt% of styrene content in each gelcoat used, wt% methylmethacrylate (MMA) content of each gel coat used; VOC (including styrene & MMA) content of each material used; VOC (including styrene) mass emission rates; and SDS for top 5 most-used materials used between January 2021 – April 2022 |
| FGRTM/PRESS | Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3 | For January 2021 – April 2022: Identity and quantity |

| | | |
|------------|---|---|
| | | (lbs) of each material used; wt% styrene content of each resin used; VOC (including styrene) content of each material used; VOC (including styrene) mass emission rates in lb/month and 12-month rolling period, and SDS for the top 5 most-used materials from January 2021 – April 2022 |
| FGMACTVVVV | Monitoring/Recordkeeping SC VI.2, VI.3, & VI.5 | For January 2021 – April 2022: HAP monthly (weighted-average model point value) and 12-month rolling emissions; the limits for production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat; HAP content for all resin and gel coat used for January 2021 – April 2022 |
| FGMACTWWWW | Testing/Sampling SC V.1; Monitoring/Recordkeeping SC VI.2, VI.4, & VI.5 | HAP content of resins received and as applied; Emissions calculation records to demonstrate compliance with the emissions limits specified in Table 3 of the MACT Subpart WWWW |

On June 13, 2022, the AQD emailed a list of requested records to Great Lakes Composite and requested that the records be submitted no later than close of business on June 27, 2022. On June 27, 2022, Great Lakes Composite’s consultant requested that the records request be extended to July 5, 2022. After a call on July 7, 2022, with John Mason, Great Lakes Composite’s EHS Director, the AQD allowed Great Lakes Composite an additional 30 days from July 7, 2022, to supply all requested records. Records were therefore due to the AQD by August 8, 2022. A follow-up email was sent to John Mason on August 3, 2022, as a check-in to determine the status of the

requested records however, the AQD did not receive a response. As of August 10, 2022, the AQD has not received these records.

Because Great Lakes Composite was unable to produce the requested records within the requested timeframe, this is a violation of recordkeeping requirements specified in the following Emission Units/Flexible Groups under ROP No. MI-ROP-N2430-2019b:

- EUADHESIVEDISPING
 - Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3
- EUFOAM
 - Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3
- EUCLEANUP
 - Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3
- FGOPENMOLDING
 - Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3
- FGGELCOAT
 - Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3
- FGRTM/PRESS
 - Monitoring/Recordkeeping SC VI.1, VI.2 & VI.3
- FGMACTVVVV
 - Monitoring/Recordkeeping SC VI.2, VI.3, & VI.5
- FGMACTWWWWW
 - Testing/Sampling SC V.1
 - Monitoring/Recordkeeping SC VI.2, VI.4, & VI.5

The Emission Unit/Flexible Group conditions of ROP No. MI-ROP-N2430-2019b requires records to show compliance with the Emission Limits and Material Limits of each Emission Unit/Flexible Group, the calculations of which are required to be completed by the last day of the calendar month, for the previous calendar month.

Because of the lack of records, the AQD was unable to determine compliance with MI-ROP-N2430-2019b Emission Limits and Material Limits at this time.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by September 1, 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 recurrence.

Adam Fenton
Great Lakes Composite, LLC
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The written response should also provide a date by which Great Lakes Composite plans to submit all requested records outlined in this violation notice.

Please submit the written response to EGLE, AQD, Lansing District, at Constitution Hall, 525 West Allegan, Lansing District Office, First Floor South, Lansing, Michigan 48909 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Great Lakes Composite 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 Great Lakes Composite. 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,



Michelle Luplow
Environmental Quality Analyst
Air Quality Division
517-294-9294

cc: Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Bob Byrnes, EGLE