



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

November 29, 2016

Mr. Dennis Jones
Fiberglass Composites
68966 Union Street
White Pigeon, Michigan 49099

SRN: N3279, St. Joseph County

Dear Mr. Jones:

VIOLATION NOTICE

On October 17, 2016, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of Fiberglass Composites (Facility), located at 68966 Union Street, White Pigeon, Michigan. The purpose of this inspection was to determine the Facility'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 Permit to Install (PTI) No. 326-00 and 1087-91.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Resin application, gelcoat application, and cleanup	Special Condition Numbers 9., 12.A., 12.B., 12.C., 12.D., 12.E., 12.F., 12.G., 12.H., 12.I., 12.K., 12.L., 12.M., 12.N., 13.A., 13.C., 13.D., and 13.E. of PTI No. 326-00.	Records were not available of the chemical composition of each raw material used (catalyst, resin, gelcoat, and cleanup solvent). Records were not available for the amounts of resin, gelcoat, catalyst, and cleanup solvent used on a daily basis; nor the styrene content of resin and gelcoats, the MMA content of gelcoats, and the volatile organic compound (VOC) content of catalysts. Calculations were not available for styrene, MMA, and total VOC emissions determining the average

		hourly emission rate in pounds per hour on a daily basis separately for resin application and gel coat application, and combined for resin and gelcoat. Monthly and 12 month rolling time period calculations were not available for styrene, MMA, and VOC emissions. Acetone emissions were not available determining calendar day, monthly, and 12 month rolling time period emissions. Daily hours of operation records were not available. Records were not available showing the hazardous air pollutant (HAP) content of each material used, nor individual, and aggregate HAP calculations determining the monthly and 12 month rolling time period HAP emissions.
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During this inspection, the Facility was unable to produce emission records.

This is a violation of the recordkeeping and emission limitations specified in Special Condition Numbers 9., 12. A., 12.B., 12.C., 12.D., 12.E., 12.F., 12.G., 12.H., 12.I., 12.K., 12.L., 12. M., 12.N., 13.A., 13.C., 13.D., and 13.E. of PTI No. 326-00.

The conditions of PTI No. 326-00 require maintenance of records, which shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by December 21, 2016. 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

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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 the Facility 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 the Facility. 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,

A handwritten signature in cursive script that reads "Dennis Dunlap".

Dennis Dunlap
Environmental Quality Specialist
Air Quality Division
269-567-3553

DD:CF

Enclosure

cc: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Thomas Hess, DEQ
Ms. Mary Douglas, DEQ