

9301 Marine City Highway • Ira Township • MI • 48023

February 19, 2024

Michigan Department of Environment, Great Lakes, and Energy

SRN: N7499

Violation Response

To Whom it may concern,

On Monday February 12th, 2024, we had a zoom meeting with Noshin Khan discussing the violation and how to take corrective action to correct the violations. She was able to review the violations and to help guide with the appropriate corrective actions.

The first violation was correcting the bottom right fabric filter in EUBOOTH2. Since that meeting, we have replaced the filter. I have attached a picture of the replaced filter for reference.

The second violation was in regards to Federal reference test Method 24. We have reached out to RTI laboratories and spoke to Llyod Kaufman. We will be sending two samples at a time until our requirements are fulfilled for the next walk through.

The third violation for recordkeeping is inordinance with the second violation. Once we receive our tested samples back from RTI it will help us to correct our records to the appropriate emissions calculations.

I have attached our violation notice for reference. If you have any questions for us, please feel free to reach out to us.

Jessica Smeader Office Manager 586-725-8227

jsmeader@modinteriors.com

Jessica Smeader

From: Sent: To: Jessica Smeader <jmegie01@icloud.com> Monday, February 19, 2024 3:17 PM Jessica Smeader



Sent from my iPhone



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STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY

WARREN DISTRICT OFFICE



February 1, 2024

Justin Moon Mod Interiors, Incorporated 9301 Marine City Highway Ira Township, 49023

SRN: N7499, Saint Clair County

Dear Justin Moon:

VIOLATION NOTICE

On November 13, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Mod Interiors, Inc. located at 9301 Marine City Highway, Ira Township, Michigan. The purpose of this inspection was to determine Mod Interior'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) number 80-15.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coating operations	PTI 80-15, FGWOOD, Special Condition (S.C.) IV.1	The bottom right fabric filter in EUBOOTH2 was not in place.
Recordkeeping	FGWOOD S.C. VI.3, VI.4; FGFACILITY S.C. VI.3, VI.4	Emissions calculations do not account for all topcoats, adhesives, PVC glue, and clean-up solvents. Current calculations are inaccurate.
Testing	FGWOOD S.C. V.1	Federal Reference Test Method 24 is not being used to determine VOC content of coatings.

Justin Moon Mod Interiors, Incorporated Page 2 February 1, 2024

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 22, 2024 (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.

Please submit the written response to Noshin Khan at EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 or KhanN5@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Mod Interiors, Inc. 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 Mod Interiors, Inc. 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,

Noshin Khan Environmental Engineer Air Quality Division 586-536-1197

cc: Annette Switzer, EGLE Christopher Ethridge, EGLE Brad Myott, EGLE Jenine Camilleri, EGLE Joyce Zhu, EGLE