



GRETCHEN WHITMER
GOVERNOR

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



DANIEL EICHINGER
ACTING DIRECTOR

January 31, 2023

VIA E-MAIL AND U.S. MAIL

Donald Megie
Mod Interiors, Incorporated
9301 Marine City Highway
Ira Township, Michigan 48023

SRN: N7499, Saint Clair County

Dear Donald Megie:

VIOLATION NOTICE

On November 9, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Mod Interiors located at 9301 Marine City Highway, Ira Township, Michigan. The purpose of this inspection was to determine Mod Interiors' 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
Recordkeeping	FGWOOD Special Conditions (S.C.) VI.3.b-d, VI.4.c; FGFACILITY S.C. VI.3.c-e, VI.4.c-e.	Records provided by Mod Interiors do not include monthly and 12-month rolling emission calculations for VOCs, acetone, light hydrotreated distillate, and individual and aggregate HAPs. Calculations do not reflect the VOC, acetone, light hydrotreated distillate, and HAP contents of the coatings based on SDS's.

During this inspection, Mod Interiors provided a spreadsheet containing daily usage of coatings and calculations for daily pollutant emissions. However, these records did not contain all required calculations, including monthly and 12-month rolling emission calculations for VOCs and acetone, light hydrotreated distillate, and individual and

aggregate HAPs. The emissions calculations use conversion factors that do not match the coating composition in the SDS's provided by the facility. When consulting with the facility regarding these inconsistencies, it was determined that calculations in the spreadsheet were not updated as coatings were placed in or out of use.

This is a violation of the recordkeeping requirements specified in Special Conditions FGWOOD VI.3.b-d, VI.4.c, and FGFACILITY VI.3.c-e, VI.4.c-e of PTI number 80-15.

These conditions of PTI number 80-15 require the following records:

FGWOOD VI.3.

- b) VOC and acetone content, in pounds per gallon, of each topcoat, adhesive coating, PVC glue, and clean-up solvents as applied.
- c) VOC and acetone mass emission calculations determining the monthly emission rate in pounds and tons per calendar month.
- d) VOC and acetone mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

FGWOOD VI.4.

- c) Light hydrotreated distillate (CAS No. 68410-97-9) content, in pounds per gallon or pound per pound, of each material as applied.

FGFACILITY VI.3.

- c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.
- d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.
- e) Individual and aggregate HAP emission calculations determining the cumulative emission rate of each during the first 12-months and the annual emission rate of each thereafter, in tons per 12-month rolling time period as determined at the end of each calendar month.

FGFACILITY VI.4.

- c) Light hydrotreated distillate (CAS No. 68410-97-9) content, in pounds per gallon or pound per pound, of each material as applied.
- d) Light hydrotreated distillate (CAS No. 68410-97-9) emission calculations determining the monthly emission rate in pounds per calendar month.

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e) Light hydrotreated distillate (CAS No. 68410-97-9) emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by February 21, 2023 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 EGLE, AQD, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Mod Interiors 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 violation cited above and for the cooperation that was extended to me during my inspection of Mod Interiors. If you have any questions regarding the violation 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