



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

July 22, 2020

Mr. John Hubbarth, Chief Operating Officer
Mold Masters Company
1455 Imlay City Road
Lapeer, Michigan 48446

SRN: A2809, Lapeer County

Dear Mr. Hubbarth:

VIOLATION NOTICE

On June 19, 2020, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Violation Notice (VN) response letter on behalf of Mold Masters Company (Mold Masters) located at 1455 Imlay City Road, Lapeer, Michigan. As part of this response to the January 29, 2020 VN previously sent by the AQD, actual emission recordkeeping was provided. These records were subsequently reviewed by the AQD to determine Mold Masters' 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 368-08C.

During the review of emission recordkeeping, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGFacility	Rule 210(1)	Actual emissions of toluene exceeded 10 tons per year, over a rolling 12-month period, from September 2019 through May 2020, but the source had not first obtained a Renewable Operating Permit

The spreadsheet provided with the VN response demonstrated that actual emissions of toluene from the FGFacility process equipment were over 10 tons per year, over a 12-month rolling average, from September 2019 through May 2020.. The highest single value reported was 12.31 tons, for the 12-month rolling time period ending in March, 2020. Having actual emissions above the major source threshold of 10 tons per year for a single Hazardous Air Pollutant (HAP) has made the facility a major source of HAP emissions.

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Rule 210(1) requires, in part, that a facility not operate any emission units at a major stationary source of emissions except in compliance with the conditions of a renewable operating permit (ROP). Therefore, Mold Masters must either apply for a ROP, or take measures to restrict its potential and actual emissions from exceeding the major source HAP threshold.

The compliance program which was provided with the June 19, 2020 response to the January 29, 2020 Violation Notice (VN) from the AQD, has detailed an acceptable plan for Mold Masters to return to compliance with the limit of 9.0 TPY for a single HAP contained within PTI No. 368-06C, Special Condition FG Facility I. 1. Compliance with this limit will allow Mold Masters to stay below the major source thresholds, eliminating the need to obtain a ROP. Therefore, no further written response is necessary to today's VN.

If Mold Masters 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 your cooperation on this issue. 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,



Daniel A. McGeen
Environmental Quality Analyst
Air Quality Division
517-648-7547

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE