



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

August 5, 2024

VIA EMAIL ONLY

Chris Clark Jr.
DGP Inc.
3260 Fenner Street
Marlette, Michigan 48453

SRN: N2383, Sanilac County

Dear Chris Clark Jr.:

VIOLATION NOTICE

On June 18, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of DGP Inc. located at 3260 Fenner Street, Marlette, Michigan. The purpose of this inspection was to determine DGP Inc. 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-N2383-2023.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Site Wide	ROP No. MI-ROP-N2383-2018, FG-MACT, Special Condition (SC) VI.2; and NESHAP Subpart WWWW	Non-submittal of semi-annual compliance report

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production. These standards are found in 40 CFR Part 63, Subpart WWWW. This Subpart requires the facility to submit semi-annual compliance reports indicating compliance with the NESHAP Subpart WWWW. The facility has failed to include this report in their ROP Certification Reports for the past two reporting cycles (September 2023 and March 2024). The non-submittal of this portion of their semi-annual compliance reports is a violation per ROP No. MI-ROP-N2383-2018, FG-MACT, Special Condition (SC) VI.2; and the NESHAP Subpart WWWW.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 26, 2024 (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

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DGP Inc.
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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 Rachel Benaway at EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or BenawayR@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If DGP 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 violation cited above and for the cooperation that was extended to me during my inspection of DGP Inc.. 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,

A handwritten signature in black ink that reads "Rachel Benaway". The signature is fluid and cursive, with the first name "Rachel" written in a larger, more prominent script than the last name "Benaway".

Rachel Benaway
Senior Environmental Quality Analyst
Air Quality Division
269-370-2170

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Gina McCann, EGLE