

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

A644462345

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|--|-----------------------------------|---------------------------|
| FACILITY: Midwest Rubber Company             |                                   | SRN / ID: A6444           |
| LOCATION: 3525 RANGELINE RD, DECKERVILLE     |                                   | DISTRICT: Bay City        |
| CITY: DECKERVILLE                            |                                   | COUNTY: SANILAC           |
| CONTACT: Janet Brown , Environmental Manager |                                   | ACTIVITY DATE: 03/08/2022 |
| STAFF: Adam Shaffer                          | COMPLIANCE STATUS: Non Compliance | SOURCE CLASS: SM OPT OUT  |
| SUBJECT: On-site inspection.                 |                                   |                           |
| RESOLVED COMPLAINTS:                         |                                   |                           |

An onsite inspection and records review was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Midwest Rubber Company (MR) site located in Deckerville, MI. Applicable records were requested on March 4, 2022, to verify compliance with permit to install (PTI) No.'s 102-19, 259-04A, 387-86A, 567-94B, 375-97B, 136-17, 276-06, 376-97, 383-86, 388-86, 373-97, and 196-87. An in-person inspection to verify onsite compliance was completed on March 8, 2022.

### Facility Description

The MR facility is a plastic and rubber manufacturing facility with products produced for automotive, medical, and other commercial industries. The facility has taken opt out permit limits for hazardous air pollutants (HAPs) and volatile organic compounds (VOCs).

### Offsite Compliance Review

Based on the timing of the inspection, the 2021 Michigan Air Emissions Reporting System (MAERS) Report was submitted on February 10, 2022 and reviewed. Upon review, MR overreported several tons of VOCs when comparing to the records that were provided for the March 2022 inspection. This was discussed with the company and were asked if they wished to correct and resubmit the 2021 MAERS Report. MR staff declined and the report was concluded to be acceptable.

### Compliance Evaluation

Records requests were sent to Ms. Janet Brown, Environmental Manager, prior to and following the onsite inspection. Electronic copies were provided as well as select items at the time of the onsite inspection. The records will be discussed further in this report. The onsite inspection was completed on March 8, 2022. AQD staff AS arrived onsite at 9:57am. Weather conditions at the time were sunny skies, temperatures in the high 30's degrees Fahrenheit, and winds from the west at 0-5mph. While offsite, no odors were noted, and emissions observed appeared to be steam / heat coming from a stack. Upon arriving onsite, AS met with Ms. Brown, who provided a tour of the facility and answered site specific questions. Requested records were provided by Ms. Brown.

As mentioned above, MR is a plastic and rubber manufacturing facility. The various stages of onsite operations were observed during the inspection.

### **PTI No. 102-19**

EULCO #19 - This emission unit is for a final cure oven for soft gold neoprene medical cushions. This unit was observed during the course of the site inspection. At the time of the inspection, this unit was not in use. After speaking with company staff, it appears this unit is

used daily. During operation the temperature of the oven will start at 190°F and rise up to 250°F.

Per Special Condition (SC) III.1, the heat capacity for this unit shall not exceed 1.0 MMBtu/hr. During the inspection this was verified by MR staff to be correct.

Per SC III.2, this emission unit shall only use natural gas for this emission unit. This was verified with company staff to be correct.

Per SC III.3, the cure oven shall only be used for the final cure of soft gold neoprene medical cushions. During the course of the inspection, this was verified to be being completed.

One stack is listed in association with this emission unit. It was verified by staff that the stack has not changed since at least the last inspection.

#### **PTI No. 259-04A**

FGCOAT1 – This flexible group includes emission units EUAUTOPARTSCOAT, EUMEDCOAT, EUDIPADHESIVE, and EUBRUSHADHESIVE. Descriptions of each emission unit are listed below. At this time, all portions of the flexible group have been removed with the exception of one paint booth that may also be potentially removed in the future. AQD staff AS spoke with the company on potential options such as voiding the permit and use a potential exemption (Rule 287 or Rule 290) for the remaining paint booth. The company later requested to void PTI No. 259-04A due to the current and future site work conditions.

EUAUTOPARTSCOAT – This emission unit is for coatings applied to plastic automotive parts and dried in an associated curing oven. At the time of the inspection, all portions of the emission unit had been removed except for the paint booth.

EUMEDCOAT – This emission unit is for coating polyurethane medical devices. This emission unit had been removed at the time of the inspection.

EUDIPADHESIVE – This emission unit is for a two-part rubber adhesive applied to metal automotive parts. This emission unit had been removed at the time of the inspection.

EUBRUSHADHESIVE – This emission unit is for contact adhesive hand-brushed onto plastic automotive parts. This emission unit had been removed at the time of the inspection.

This flexible group is subject to a VOC emission limit of 18.0 tons per year (tpy) per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, 12.39 lbs of VOCs were reported emitted. As of February 2022, 0.061535 tpy of VOCs were reported emitted which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit.

This flexible group is subject to several material limits, however, due to several of the emission units having been removed, the only material limit that was reviewed was VOC coating content of 4.0 lbs/gal minus water as applied for EUAUTOPARTSCOAT. Records were requested and reviewed. Based on the records reviewed, there appeared to be concerns regarding this emission limit, however, since the company has requested to void PTI No. 259-04A, no further action will be taken at this time.

Per SC III.1, the curing oven portion of FGCOAT shall operate at least at 194°F. It was verified by company staff that the curing oven portion has been removed.

Per SC III.2-3, containers of waste / product shall be kept closed when not in use. Based on observations made during the inspection, this appeared to be being completed.

Per SC III.4, spent filters are to be disposed of properly. Speaking with company staff this appears to be being completed.

Per SC IV.1, exhaust filters are to be installed and operated properly. Speaking with company staff, the filters appear to be changed in an appropriate frequency.

Per SC IV.2, the permittee shall install a device to monitor the temp of the curing oven portion. As stated above the curing oven portion for this flexible group has been removed.

Per SC IV.3, the permittee shall use high volume low pressure (HVLP) application technology with test caps available for testing. Speaking with company staff this was verified to be being completed.

Per SC V.1, the company shall use manufacturers formulation data to determine the VOCs of materials used for FGCOAT1. Formulation data was requested for select materials and provided. The information provided appears acceptable at this time.

Per SC VI.3, the permittee shall monitor and record, in a satisfactory manner, the temperature of the curing oven portion of FGCOAT1 on an hourly basis, while the oven is in operation. As mentioned above, the oven had been removed at the time of the inspection, therefore, no applicable records were requested.

Per SC VI.4, the permittee shall keep track of the usage rates of VOC containing materials used and reclaimed (if applicable), VOC contents, and monthly / 12-month rolling time period VOC emissions. Records were requested and provided for select time periods. No reclaim is applied to emissions reported. Based on the records reviewed, MR appears to be keeping track of applicable items.

Two stacks are listed in association with this flexible group. Speaking with company staff it was verified that the stacks have not changed since the last inspection.

#### **PTI No. 387-86A**

FGPF09and10 – This flexible group includes emission units EUPFO-9 AND EUPFO-10. Descriptions of each emission unit are listed below.

EUPFO-9 – This emission unit is for plastisol fusing oven #9.

EUPFO-10 – This emission unit is for plastisol fusing oven #10.

These emission units were observed during the course of the site inspection.

This flexible group is subject to an hourly VOC emission rate of 3.49 lbs/hr per test protocol. At this time, no testing will be required per SC V.1.

This flexible group is subject to a VOC emission limit of 7.26 tpy per a 12-month rolling time period. Records were requested and provided for select time periods. As of February 2022,

16.26 lbs of VOCs were reported emitted. As of February 2022, 0.08784 tpy of VOCs were reported emitted which is well within the permitted limit. Previous 12-month rolling time periods reviewed, also appeared to be within the permitted limit.

Per SC I.3, there shall be no visible emissions from FGPF09 and 10. No visible emissions were observed during the course of the site inspection.

Per SC VI.1, the permittee shall keep track of monthly / 12-month rolling time period VOC emissions. Records were requested and provided for select time periods. Based on the records reviewed, MR appears to be keeping track of applicable records.

Four stacks are listed in association with this flexible group. It was verified by company staff during the inspection that no changes have been made to the stacks since the last inspection.

#### **PTI No. 567-94B**

EUPFO-12 – This emission unit is for a plastisol dip molding line including a dip coating process and natural gas-fired plastisol fusing oven (PFO) # 12.

This emission unit is subject to a VOC emission limit of 2.5 tpy per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, 4.03 lbs of VOCs were reported emitted. As of February 2022, 0.019665 tpy of VOCs were emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit.

This emission unit is subject to a visible emission limit of 5% opacity. At this time, visible emissions shall not be requested to be evaluated per SC V.2. No visible emissions were observed during the course of the site inspection.

This emission unit is subject to a material limit for plastisol VOC contents of 1% by weight. The facility uses manufacturers formulation data to determine the VOC contents and records were requested and provided for select materials. Based on the records reviewed, MR appears to be meeting this material limit.

Per SC III.1-2, the permittee shall keep covered when not in use all waste / product containers. Several containers were noted open during the inspection. AQD staff AS pointed out to staff several open containers not in use which was immediately addressed by company staff. Moving forward all applicable containers must be closed when not in use to limit emissions.

Per SC VI.3, the permittee shall keep track of pounds of plastisol coating used, VOC content (minus water and with water) of each plastisol coating as applied, and VOC monthly / 12-month rolling time period emissions. Records were requested and provided for select time periods. After further review, the records appear to be acceptable.

One stack was listed in association with this emission unit. Company staff verified that no changes have occurred to the stack since the last inspection.

FGPF015-16-17 – This flexible group includes emission units EUPFO-15, EUPFO-16, and EUPFO-17. Descriptions of each emission unit are listed below.

EUPFO-15 – This emission unit is for a plastisol dip molding line including a dip coating process and natural gas-fired preheat oven and separate plastisol fusing oven (PFO) # 15.

EUPFO-16 – This emission unit is for a plastisol dip molding line including a dip coating process and natural gas-fired combined preheat and plastisol fusing oven (PFO) # 16.

EUPFO-17 – This emission unit is for a plastisol dip molding line including a dip coating process and natural gas-fired combined preheat and plastisol fusing oven (PFO) # 17.

This flexible group is subject to a VOC emission limit of 3.3 tpy per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, 286.61 lbs of VOCs were reported emitted. As of February 2022, 1.40031 tpy of VOCs were reported emitted which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit.

This flexible group is subject to a plastisol material limit of 215,000 lbs/yr per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, 15,711.04 lbs of material was used. As of February 2022, 152,323.42 lbs of material was used which is within the permitted limit.

This flexible group is subject to a material limit for plastisol VOC contents of 3% by weight. Records were requested and provided. Based on the records provided, MR appears to be meeting this material limit.

Per SC III.1-2, the permittee shall keep all waste / product containers closed when not in operation. Based on the observations made at the time of the inspection, this appeared to be being completed.

Per SC VI.3, the permittee shall keep track of pounds of each plastisol coating used, VOC contents, and monthly / 12-month rolling time period VOC emissions. Records were requested and provided for select time periods. Based on the records reviewed, overall MR appears to be keeping track of applicable records.

Three stacks are listed in association with this flexible group. It was verified by company staff that no changes have been made to the stacks since the last inspection.

#### **PTI No. 375-97B**

FGCELL39PDT/LOS – This flexible group includes emission units EUPDT/LO1, EUPDT/LO2, and EUPDT/LO4. Descriptions of each emission unit are listed below.

EUPDT/LO1 – This emission unit is for a plastisol dip tank with a natural gas-fired oven located in cell 39.

EUPDT/LO2 – This emission unit is for a plastisol dip tank with a natural gas-fired lab oven located in cell 39.

EUPDT/LO4 – This emission unit is for a plastisol dip tank with a natural gas-fired lab oven located in cell 39.

This flexible group is subject to a VOC emission limit of 2.97 tpy per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, 24.44 lbs of VOCs were emitted. As of February 2022, 0.169575 tpy of

VOCs were emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit.

This flexible group is subject to a plastisol material limit of 297,216 lbs/yr per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, 2,443.96 lbs of material was used. As of February 2022, 33,734.64 lbs of material was used which is within the permitted limit.

This flexible group is subject to a material limit for plastisol VOC contents of 2% by weight. Records were requested and provided. Based on the records provided, MR appears to be meeting this material limit.

Per SC VI.3, the permittee shall keep track of hours of operation for each lab oven, pounds of plastisol processed in FGCELL39PDT/LOS, VOC contents of each material, calculations determining the mass emission rate from the process, based on the percentage of VOC in the raw materials, and monthly / 12-month rolling time period VOC emissions. Records were requested and provided for select time periods. Based on the records reviewed, the applicable items appear to be being kept track of for this flexible group.

Three stacks are listed in association with this flexible group. It was verified during the inspection that no changes have been made to the stacks since the last inspection.

#### **PTI No. 136-17**

EUCELL40 – This emission unit is for a coating line for flexible urethane foam products. The line consists of a dry filter, spray paint coating booth with HVLP or equivalent spray guns, urethane product molds, mold release coating followed by a barrier coating inside the paint booth.

This emission unit is subject to a 6.8 tpy VOC emission limit per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, the unit appeared to have not been run. As of February 2022, 0.0153 tpy of VOCs were reported emitted which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit.

This emission unit is subject to a 510 gallon / month polyol material limit. Records were requested and provided for select time periods. For the month of February 2022, there appeared to be no usages of the polyol material. Previous months reviewed were within the 510 gallons / month limit.

This emission unit is subject to an instantaneous material limit for the barrier coat of 0.75 lbs / gal for VOCs. Based on the records reviewed, this limit appears to be being met.

Per SC III.1 & 3, the permittee shall keep all materials closed when not in use in order to prevent fugitive emissions. Based on the observations made at the time of the inspection, this appeared to be being completed.

Per SC III.2, the permittee shall dispose of all spent filters for this emission unit in a satisfactory manner. After speaking with company staff, the filters appear to be being disposed of in a satisfactory manner.

Per SC IV.1-2, the permittee shall not operate EUCELL40 unless all respective exhaust filters are installed and operated in a satisfactory manner. Additionally, the permittee shall use HVLP applicators or similar technology with test caps available. The emission unit was not in operation at the time of the inspection, and it was concluded that there were problems with acquiring the applicable materials to run the unit. The booth had two manual application units that were HVLP, test caps were available, and the filters are changed on an as needed basis when in use.

One stack is listed in association with this emission unit, and it was verified by company staff that no changes have occurred to the stack since the last inspection.

#### **PTI No. 276-06**

EU-CL-05 – This emission unit is for a natural gas heated carousel type plastisol casting line consisting of a chain conveyor that carries castings through filling stations, a curing oven, a cooling area, and a stripping station.

This emission unit is subject to a VOC emission limit of 1.8 tpy per a 12-month rolling time period. Records were requested and reviewed for select time periods. For the month of February 2022, 4.21 lbs of VOCs were reported emitted. As of February 2022, 0.01355 tpy of VOCs were reported emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit.

Per SC 1.2 and 1.3, all waste plastisol materials and VOC containing products shall be kept closed when not in operation in order to reduce fugitive emissions. Additionally, all waste plastisol materials shall be disposed of properly. Based on the observations made at the time of the inspection, MR appeared to be keeping containers covered when applicable.

Per SC 1.7, the permittee shall keep track of usage rates, VOC contents, VOC monthly / 12-month rolling time period emissions and hours of operation for EU-CL-05. Records were requested and provided for select time periods. Based on the records reviewed, MR appears to be keeping track of the applicable items.

Three stacks are listed in association with this emission unit. During the inspection, it was verified by company staff that no changes have occurred to the stacks since the last inspection.

FGFACILITY - This flexible group is for all process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.

This flexible group is subject to individual / aggregate HAP emission limits of less than 9.0 tpy and less than 22.5 tpy respectively per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, 15.35 lbs of aggregate HAPs were emitted. As of February 2022, 317.3993 lbs of aggregate HAPs were emitted per a 12-month rolling time period which is well within the permitted limit of both individual and aggregate HAPs. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limits. The HAP emission records for FGFACILITY and issues identified are discussed further below.

This flexible group is subject to a VOC emission limit of less than 90 tpy per a 12-month rolling time period. Records were requested and provided for select time periods. For the month of February 2022, 530.46 lbs of VOCs were reported emitted. As of February 2022, 2.819995 tpy of VOCs were reported emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit.

Per SC 2.2, all VOC and HAP containing materials shall be handled in a manner to limit fugitive emissions. During the course of the inspection, several containers were noted open and appeared to not be in use. The containers were pointed out to company staff who addressed it immediately. Overall, MR appeared to be properly handling materials and limiting fugitive emissions.

Per SC 2.3, the permittee shall use manufacturer's formulation data to determine the HAP content of any material as received and as applied. Records were requested and received. Based on the records reviewed, it appears that the company is keeping track of HAP contents for several materials. Moving forward, manufacturers formulation data shall be used when determining HAP contents as required.

Per SC 2.6a-e, MR shall keep track of usage rates, where applicable any reclaim, HAP contents, and individual / aggregate HAP monthly / 12-month rolling time period emissions. Records were requested and provided for select time periods. It was verified by the company that no reclaim of materials is applied to emissions. Upon review, several of the materials that appeared to be used contained HAPs that were not included in the emission records. Talking with company staff it appeared the company has never done a thorough review of all materials used sitewide. The records were concluded to not be acceptable, and this is a violation of PTI No. 276-06, FGFACILITY, SC 2.6d-e. Though not a violation since it was not verified, the company shall moving forward verify that all HAP emissions are accounted for in materials used sitewide as required.

Per SC 2.7a-e, MR shall keep track of usage rates, where applicable and reclaim of VOC containing materials, VOC contents and monthly / 12-month rolling time period VOC emissions. Records were requested and reviewed for select time periods. Based on the records reviewed, MR appears to be keeping track of applicable items.

#### **PTI No. 376-97**

This permit is for five slush line forming and curing operations using a hot salt solution. It was noted during the inspection that one of the hot salt solution units (RGSALT 1 Cell 21) was removed in April 2020.

This permit has an hourly VOC emission limit of 2.42 pounds per hour and a 7.6 tpy VOC emission limit per a 12-month rolling time period. Records were requested and reviewed for select time periods. For the month of February 2022, 20.33 lbs of VOC emissions were reported. As of February 2022, 0.201035 tpy of VOC emissions were reported which is well within the permitted limit. Previous 12-month rolling time periods also appeared to be within the tpy permitted limit. Speaking with AQD permit staff it would appear that the hourly emission rate is based off of a 12-month rolling time period. As of February 2022, the hourly VOC emission rate is 0.085 lbs per hour. The facility is keeping track of total VOC emissions and hours of operation, however, did not appear to be keeping a lbs per hour tab. Moving forward an hourly emission rate shall be included in records as required per PTI No. 376-97.



Per SC 15, the VOC content for the plastisol used shall not exceed 1% by weight. Records were requested and reviewed for select materials. For two of the three materials used, the listed VOC content is 1.5%. This was made aware to company staff. Additional documentation was provided from the supplier; however, the documentation did not verify that the VOC contents are less than 1%. Additionally, it does not appear testing has been done to verify the VOC contents. This is a violation of PTI No. 376-97, SC 15.

Per SC 16, testing may be requested to verify VOC emission rates. At this time no testing is required.

Per SC 17, MF shall keep track of usage rates for each slush line, pounds of plastisol processed, calculations determining the mass emission rates from operations, and monthly / 12-month rolling time period VOC emissions. Records were requested and reviewed for select time periods. Based on the records reviewed, MF appears to be keeping track of the applicable items.

Five stacks are listed in association with the PTI. It was concluded after speaking with company staff that no changes have occurred to the stacks since the last inspection.

#### **PTI No. 383-86**

This permit is for three dryers. The three dryers were observed during the course of the site inspection.

Per SC 14, there shall be no visible emissions from the three dryers. No visible emissions were observed from the three dryers during the course of the site inspection.

Per SC 15, there shall be no new materials used in the three dryers. It was verified by company staff that no new materials have been added to the three dryers since the last inspection.

#### **PTI No. 388-86**

This permit is for five truck part ovens. The ovens were observed during the course of the site inspection.

Per SC 14, there shall be no visible emissions from the five truck part ovens. No visible emissions were observed from the ovens during the course of the site inspection.

Per SC 15, there shall be no new materials used in the five truck part ovens. It was verified by company staff that no new materials have been added to the ovens since the last inspection.

#### **PTI No. 373-97**

This permit is for three latex curing ovens and two dip tanks. The ovens and dip tanks were observed during the course of the site inspection.

This permit has an hourly VOC emission rate of 1.1 pounds per hour and a 3.2 tpy VOC emission limit per a 12-month rolling time period. For the month of February 2022, 164.32 lbs of VOCs were emitted. As of February 2022, 972.3 lbs of VOCs were reported emitted which is within the permitted limit. The hourly emission rate was concluded to be per a 12-

month rolling time period and the hourly emission rates for the two ovens in operation were within the permitted limit.

#### **PTI No. 196-87**

This permit is for two plastisol fusing processes. It was verified during the course of the site inspection that one of the fusing processes had been removed.

This permit has an hourly VOC emission limit of 3.78 pounds per hour and a 14.2 tpy VOC emission limit per a 12-month rolling time period. Records were requested and reviewed for select time periods. For the month of February 2022, 31.85 lbs of VOCs were reported emitted. As of February 2022, 0.07571 tpy of VOCs were reported emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit. Based on the records reviewed, MR appears to be meeting their hourly VOC emission limit.

Per SC 15, the process is limited to a 20% opacity over a 6-minute average. No visible emissions were observed from this unit during the course of the site inspection.

Per SC 17, MR shall keep track of the amount of each plastisol used in this process. Records were requested and reviewed for select time periods. Based on the records reviewed, MR appears to be keeping track of applicable records.

Per SC 19, MR shall not substitute any coatings for those described in the permit application that would result in a meaningful change. It was verified by company staff that no new coatings have been used in this process since the last inspection.

#### **Additional Observations**

During the course of the site inspection, select units were noted to be labeled with that applicable permit. However, there was confusion during the inspection in verifying the various equipment with the correct permit. Moving forward, MR shall properly label each emission unit with the applicable permit for easier understanding to verify compliance.

In reviewing previous 12-month rolling time period emissions for several permits, the current format required several copies of excel files to verify compliance. It was discussed with company staff and suggested on different formatting for easier readability of records.

Several permits require EPA test method 24 to determine the VOC contents of materials used or to request the use of manufacturers formulation data. The company uses manufacturers formulation data; however, a request had not been historically submitted. This was discussed with and moving forward the company shall submit a request to use manufacturers formulation data to determine VOC emissions for the applicable permits.

A urethane foam painting process (Cell #30) was observed during the course of the inspection. The process consisted of one paint booth with one paint spray applicator. Filters are replaced as needed. While observing the paint booth, several filter sections were noted missing. Moving forward when in operation filters will be installed and operated in a satisfactory manner. The company uses the Rule 290 exemption for this emission unit. Records were requested and provided for select time periods. For the month of February 2022, 0.89 lbs of VOCs were reported emitted. Previous monthly emissions were reviewed and discussed with company staff. After further review, the records appear acceptable at this time.

The company appears to use the Rule 290 exemption for four other emission units (RGPCC 18, RGPCC Cell #42, PFO14 Cell #33, RGMISC. Cell #2). Monthly emission records were requested and provided for select time periods. After further review, the records appear acceptable at this time. AQD staff AS spoke with MR staff and explained the components of Rule 290.

One February 4, 2021, a complaint was received regarding an aerosol application being used to remove pits and strengthen parts made. The complaint was discussed with company staff and the potential area of concern was observed during the inspection. The process appeared to be part of Cell #40, but emissions are tracked and reported as part of Cell #32. The area consisted of a background plate that parts are put on and aerosol spray painted. The process appears to have been in operation for 8-10 years. It was concluded that on a monthly average the area will use 10 aerosol spray cans. Any emissions are released into the in plant. While speaking with the company staff it appeared that MF had slightly modified some of the ingredients.

During the inspection, equipment labeled as PTI No. 386-86 and PTI No. 382-86 was observed. In a follow up records review, these two permits had been historically voided. After further review in a letter dated July 2, 2013, to the company, the equipment under PTI No. 382-86 had appeared exempt per Rule 286(a). The equipment that was labeled as PTI No. 386-86 was determined to be incorrect and is actually grandfathered. At this time this appears to be acceptable.

### Conclusion

Based on the facility walkthrough, observations made, and records received, MR appears to not be in compliance with PTI No. 276-06 and PTI No. 376-97. A violation notice will be issued for the following violations.

The HAP emission records reviewed were concluded to not be acceptable and this is a violation of PTI No. 276-06, FGFACILITY, SC 2.6d-e.

Plastisol used in the slush forming and curing operations that use a hot salt solution were over the 1% VOC content limit by weight. This is a violation of PTI No. 376-97, SC 15.

The company appears to be in compliance with the remaining PTIs and applicable air quality rules.

NAME Adam J. Ruella

DATE 05/23/22

SUPERVISOR C. [Signature]