



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GRETHNER
DIRECTOR

June 15, 2017

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Jim Ulrey
Grupo Antolin - Howell
3705 W. Grand River Avenue
Howell, Michigan 48855

SRN: N2198, Livingston County

Dear Mr. Ulrey:

SECOND VIOLATION NOTICE

On March 3, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Grupo Antolin - Howell located at 3705 West Grand River Road, Howell. The purpose of this inspection was to determine the facility'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 52-09B.

During the inspection, violations were cited in a letter dated April 6, 2017, with a response request due on April 27, 2017. A response extension was requested by Grupo Antolin on April 26, 2017 and granted until May 11, 2017. The response logged as received by the Lansing District Office on May 11, 2017, was found to be inadequate in addressing all cited violations. The April 6, 2017 violation letter is attached as a reference.

In addition to the cited violations, a request for a facility Potential to Emit was requested and has yet to be addressed or received. In the below table, the violations marked as resolved were an adequate response. Following the table, the remaining violations have detailed requirements that require your immediate attention in order for resolution of the outstanding violations.

Violation Number	Process Description	Rule/Permit Condition Violated	Comments	Resolved by Appropriate Response
1	FG-FORMINGLINE	R336.1201	No appropriate permit exemption rule found	Resolved
2	FG-WATERTRIM	R336.1201	No appropriate permit exemption rule found	
3	EU-SKINLINE	R336.1201	No appropriate permit exemption rule found	Resolved
4	EU-PACKAGETRAY	R336.1201	PTI 52-09A for equipment voided based on company statement that equipment was removed	
5	FG-REACTINMOLD	R336.1201	No appropriate permit exemption rule found	Resolved
6	FG-RURTLINE	R336.1201	No appropriate permit exemption rule found	Resolved

7	FG-LAMBDA967&968	R336.1201	No appropriate permit exemption rule found	
8	EU-C1	R336.1201	No appropriate permit exemption rule found	
9	EU-PAINT	PTI 52-09B, paragraph III.3.	MAP not completed	
10	EU-PAINT	PTI 52-09B, paragraph III.4. and IV.5.	Entrance NDO is less than 0.007"WC	Resolved
11	EU-PAINT	PTI 52-09B, paragraph IV.2.	Pressure test caps not available	Resolved
12	EU-PAINT	PTI 52-09B, paragraph IV.4. and VI.4	Temperature recording chart inoperative	Resolved
13	EU-PAINT	PTI 52-09B, paragraph VI.1. and VI.3.	VOC records not being tracked	
14	EU-PAINT	PTI 52-09B, paragraph VI.5.	Differential pressure monitors not being recorded	
15	FG-FACILITY	PTI 52-09B, paragraph V.1 and VI.1., VI.3.	HAP tracking not being conducted	

The following provides details to the unresolved violations with requested information no later than June 27, 2017.

2. FG-WATERTRIM consists of two separate emission units, EU-WATERTRIM1 which services parts on the FG-FORMINGLINE and EU-WATERTRIM2 which services parts on the FG-THERMOFORM line. These devices use water to cut and trim fiberglass with MDI and plastic parts and are exhausted through the roof after a mechanical cyclone. This part of the process is separate from the product production thus the use of exemption rule R336.1286 is inappropriate; exemption R336.1285(2)(l)(vi)(c) is also inappropriate due to the lack of a fabric filter.

Grupo Antolin Response - states that the facility intends to comply with this violation by installing a fabric/metal filter control before discharging to the atmosphere. Please provide an anticipated date for completion of this installation to include the anticipated control efficiency of the filter and filter type.

4. EU-PACKAGETRAY was equipment issued under now voided PTI 52-09A. Upon the application for PTI 52-09B, this equipment was included in the permit yet was later removed after email correspondence on October 14, 2015, requesting removal. Upon inspection, it was found that this device is still installed.

Grupo Antolin Response - states that the facility is claiming exemption R336.1290 yet does not provide the information required per the claimed exemption. Please provide the following information:

- a. The specific part of R336.1290 Grupo Antolin is claiming as the exemption to this unit.
- b. A detailed description of the emission unit as required in R336.1290(b).
- c. Records of material use and calculations identifying the quality, nature and quantity of the air contaminant emission are maintained in sufficient detail to demonstrate that the emissions meet the emission limits outlined in R336.1290 for the period of January 1, 2016 - December 31, 2016 as required in R336.1290(c).

7. FG-LAMBDA967&968 is a line for producing door trim components which consists of two different emission units with the same violation, EU-LAMBDA967 and EU-LAMBDA968. This violation is for the lack of permit for the installation of fabric filter controlled exhaust which handles the spray application of glue as part of the assembly process. Application rates exceed those allowed in permit exemption R336.1287 and the previous use of exemption R336.1286 is inappropriate for this part of the process.

Grupo Antolin Response - states that the facility is claiming exemption R336.1290 yet does not provide the information required per the claimed exemption. Please provide the following information:

- a. The specific part of R336.1290 Grupo Antolin is claiming as the exemption to this unit.
- b. A detailed description of the emission unit as required in R336.1290(b).
- c. Records of material use and calculations identifying the quality, nature and quantity of the air contaminant emission are maintained in sufficient detail to demonstrate that the emissions meet the emission limits outlined in R336.1290 for the period of January 1, 2016 - December 31, 2016 as required in R336.1290(c).

8. EU-C1 is a new operation similar to the FG-LAMBDA967&968. This violation is for the lack of permit for the installation of fabric filter controlled exhaust which handles the spray application of glue as part of the assembly process. Application rates exceed those allowed in permit exemption R336.1287 and the previous use of exemption R336.1286 is inappropriate for this part of the process.

Grupo Antolin Response - states that the facility is claiming exemption R336.1290 yet does not provide the information required per the claimed exemption. Please provide the following information:

- a. The specific part of R336.1290 Grupo Antolin is claiming as the exemption to this unit.
- b. A detailed description of the emission unit as required in R336.1290(b).
- c. Records of material use and calculations identifying the quality, nature and quantity of the air contaminant emission are maintained in sufficient detail to demonstrate that the emissions meet the emission limits outlined in R336.1290 for the period of January 1, 2016 - December 31, 2016 as required in R336.1290(c).

9. EU-PAINT is required to have a Malfunction Abatement Plan (MAP) as per paragraph III.3. of PTI 52-09B. The MAP was to be completed and available within 60 days after commencement of the trial operation. The trial operation began sometime in mid-June of 2016. As of the inspection, a MAP had not been completed.

Grupo Antolin Response - states that the facility provided a MAP on April 4, 2017, which was received by the Lansing District Office on the said date. The following details need to be included in the MAP as per PTI paragraph III.3. Please provide an updated MAP which includes the following information:

- a. Identification of supervisory personnel responsible for overseeing inspections, per paragraph III.3.a.
- b. Identify the normal operations entrance NDO pressure drop and the exit NDO pressure drop based on current system conditions and method of daily checks and recordkeeping. At a minimum, this must be 0.007" WC, yet allowing this as your "set point" can allow for exceedances below the intended capture rate thus Grupo Antolin is encouraged to identify the normal operating conditions and use them as indicators of a malfunction to be proactive rather than reactive at the lowest setting.
- c. A description of the corrective procedures or operational changes that shall be taken in the event of differential pressure exceedances of less than 0.007" WC (malfunction or failure) to achieve compliance with the applicable emission limits per paragraph III.3.c.

12. EU-PAINT PTI paragraphs IV.4. and VI.4. require the Regenerative Thermal Oxidizer (RTO) temperature to be constantly recorded to assure proper temperature and proper Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) emissions destruction. During the inspection, it was found that the ink needle had not been installed on the circular chart recorder and thus records could not be provided to prove compliance.

Grupo Antolin Response - states that the facility RTO is equipped with a data logger that stores a date/time stamp and the corresponding combustion zone temperature in digital format, yet records for proof of compliance in the operation of the device was not included in the response. Please provide the following information:

- a. RTO temperature records during trial operations indicating compliance with the 1450°F minimum from the initial date of trial operations until March 3, 2017.
- b. If the temperature recording is below the required temperature of 1450°F, please indicate the action(s) taken to correct the malfunction.

13. EU-PAINT PTI paragraphs VI.1. and VI.3. require the tracking of paint VOC content and VOC emissions. As of the inspection, records had not been created or made for the purpose of tracking VOC's.

Grupo Antolin Response - states that the facility has contracted with Environmental Partners, Inc. to develop a program for meeting this requirement. Please provide the following information:

- a. Date or anticipated date the paint line will be in full production.
- b. Date recordkeeping system will be operational.

14. EU-PAINT PTI paragraph VI.5. requires that the differential pressure monitors located at each NDO be recorded and maintained to ensure compliance with capture efficiency requirements. As of the inspection, records of this requirement could not be produced.

Grupo Antolin Response - states that the facility is seeking a data logging system and hopes to have it installed by July 1, 2017. Please note that this violation will remain until confirmation of the data logger is confirmed installed.

15. FG-FACILITY PTI paragraph VV.1, VI.1., and VI.3. require the tracking and recording of all HAP material and emissions in order to ensure compliance with HAP emission limits. Currently, the use of Xylene and paint containing HAP's have not been tracked or documented. This information is used to ensure the facility remains below Major Source thresholds for HAP emissions.

Grupo Antolin Response - states that the facility has contracted with Environmental Partners, Inc. to develop a program for meeting this requirement. Please provide the following information:

- a. Date or anticipated date the paint line will be in full production.
- b. Date recordkeeping system will be operational.

In addition to the information requested above, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. The potential to emit must include all hazardous air pollutants the facility uses to include cleanup solvents and any mold release agents. Information on calculating PTE can be found at the following website:

http://www.michigan.gov/deq/0,4561,7-135-3310_70487-112202--,00.html

Please be advised that failure to respond in writing and identify actions the company will take or has taken to resolve the cited violations may result in escalated enforcement action by the AQD. Please provide the information requested by June 30, 2017.

Be further advised that issuance of this Violation Notice does not preclude or limit the DEQ's ability to initiate any other enforcement action under state or federal law as appropriate.

If you have any questions regarding the violations or the actions necessary to bring Grupo Antolin into compliance, please contact me at the telephone number listed below.

Sincerely,



Nathan Hude
Environmental Quality Analyst
Air Quality Division
517-284-6779

NNH:TG

Attachment

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ