

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

N281231364

FACILITY: LEXAMAR CORPORATION		SRN / ID: N2812
LOCATION: 100 LEXAMAR DRIVE, BOYNE CITY		DISTRICT: Gaylord
CITY: BOYNE CITY		COUNTY: CHARLEVOIX
CONTACT: Daniel Anderson , Sr. Industrial Eng.		ACTIVITY DATE: 09/23/2015
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

Traveled to N2812 LexaMar Corporation to perform an unannounced scheduled inspection to determine compliance with MI-ROP-N2812-2015. The facility is located at 100 LexaMar Drive in Boyne City, Charlevoix County.

Present for the inspection were Breen (Director of HR) and Chris (HR). Dan Anderson and Todd Mikes, environmental staff, were out of the office for training. Breen has a background in environmental and has been involved in LexaMar's environmental program in the past.

New procedures for visitors included watching a short safety video with 3 question quiz at the end, and wearing a safety vest for visibility in the plant.

DEQ inspection brochures have previously been given and emailed to LexaMar.

During the inspection, EU-BCPL was painting spoilers for the Ford Explorer, and EU-URSAMINOR was coating pieces possibly for the Tahoe in the dip tank.

The RTO was operating. The facility had no odors outside the facility and no visible emissions from the process stacks on the roof or from the RTO stack. The stack height was observed and based on judgment meets the height requirement of the ROP (55 feet).

BACKGROUND/EQUIPMENT ON SITE

LexaMar produces and coats a variety of plastic parts for the automotive industry. There are two coating lines, the EU-BCPL and EU-URSAMINOR, where the facility can apply basecoats, adhesion promoters and topcoats. Emissions from the two coating lines are captured by permanent total enclosures (PTE) and ducted to a regenerative thermal oxidizer (RTO). The RTO has 2 beds and a common exhaust. One bed of the RTO is used at a time while the other acts as backup.

The facility maintains a current Air Monitoring Plan, CAM Plan and MAP/Start up/Shut down Plan.

REGULATORY DISCUSSION

LexaMar is major for HAPS.

EU-BCPL and EU-URSAMINOR are both CAM subject due to pre-control emissions of VOCs. LexaMar monitors the RTO using temperature of the center bed as an indicator of proper function of the RTO. Differential pressure between the PeTE and the outside room is an indicator of proper function of the PeTE.

EU-BCPL, EU-URSAMINOR and EU-SOLV are subject to 40 CFR Part 63, Subpart PPPP - Surface Coating of Plastic Parts and Products. Subpart PPPP requirements are addressed in the FG-PPPP table of the ROP.

EU-WASHERHEATER, EU-URSADRYOFFOVEN, EU-URSAPRIMEOVEN, EU-URSATOPCOATOVENA and EU-URSATOPCOATOVENB are subject to 40 CFR Part 63, Subpart DDDDD - Industrial, Commercial and

Institutional Boilers and Process Heaters. Subpart DDDDD becomes effective January 31, 2016 and will be subject to the pertinent requirements of the MACT at that time.

RECORDS REVIEW

EU-BCPL - The body color paint line includes 5 spray booths, 5 flash off areas, an associated curing oven and an exhaust air recirculation system for the spray booths. The paint line has a PeTE, the emissions to go the RTO.

VOC emissions are calculated and submitted on a quarterly basis to AQD. Data is reviewed and compared to limits as they are received.

The exhaust air from the spray booths, flash off areas and curing ovens are exhausted to the RTO. Proper operation of the RTO includes maintaining a temperature above 1400 degrees Fahrenheit. Temperature recording and monitoring equipment has been installed in the corners and middle in three levels (top, middle, bottom) of each Bed A and Bed B of the RTO. The facility maintains temperatures of the center of the RTO beds no lower than 1500 degrees F, which is well within proper operation conditions set in the ROP. The RTO was initially designed with a minimum retention time of 0.5 seconds. The RTO must maintain a control efficiency of 95%. The last testing was done in 2012 and met this condition.

Differential pressure is recorded as a means to demonstrate proper operation of the PTE. The differential pressure is recorded on a continual basis. The doors and windows in the PTE must be closed during routine operation. The doors and windows were observed during the inspection and were closed as required. An alarm will sound if the differential pressure goes out of range. The PTE is maintained as a negative pressure, which would draw in air through any natural draft openings if they existed.

EU-BCPL is only operated if all filters are in place. Spent filters are disposed by being bagged and handled as solid waste. Waste coatings, reducers, clean up solvents and waste solvents were viewed in the paint kitchen - they were contained and labeled.

EU-BCPL has two testing conditions. The VOC content of the five most frequently used coatings and five other coatings must be tested once during each calendar year. Testing took place December 2014. Testing is also required once every 5 years for overall VOC control efficiency of the RTO - this testing was last completed in 2012.

EU-URSAMINOR - the Ursa Minor dip coat line includes 2 dip tanks each with an associated oven. Products are dipped into the tank then lifted to dry. To meet specifications, the product may be dipped again for a thicker coating.

VOC emissions are calculated and submitted on a quarterly basis to AQD. Data is reviewed and compared to limits as they are received.

The RTO operates as described above in EU-BCPL.

Differential pressure is recorded in EU-URSAMINOR as a means to demonstrate proper operation of the PTE. The differential pressure is recorded on a continual basis. The doors and windows in the PTE must be closed during routine operation. The doors and windows were observed during the inspection and were closed as required. An alarm will sound if the differential pressure goes out of range. The PTE is maintained as a negative pressure, which would draw in air through any natural draft openings if they existed.

Spent filters are disposed by being bagged and handled as solid waste. Waste coatings, reducers, clean up solvents and waste solvents were viewed in the paint kitchen - they were contained and labeled.

EU-URSAMINOR has two testing conditions. The VOC content, water content and density of any coating as received. Records were reviewed. Testing is also required once every 5 years for overall VOC emission limit, control efficiency of the RTO - this testing was last completed in 2012.

EU-SOLV - miscellaneous solvents used for wiping parts and cleaning tanks, spray guns, booths and equipment for both paint lines.

VOCs are calculated on a monthly basis and submitted to AQD quarterly. Data is reviewed and compared to limits as they are received.

Spent filters are disposed by being bagged and handled as solid waste. Waste coatings, reducers, clean up solvents and waste solvents were viewed in the paint kitchen - they were contained and labeled.

FG-PPPP - 40 CFR Part 63, Surface Coating of Plastic Parts and Products

Subpart PPPP applies to EU-BCPL, EU-URSAMINOR and EU-SOLV. The pollution control equipment for these EU's is their PTE and the RTO. The conditions of this flexible group discuss the PTE and RTO proper operating conditions, as well as coating emission rates and proper storage and disposal. The emission limit for organic HAP (0.16 lb/lb of coating solids) is addressed in the quarterly reports LexaMar submits. Most current records show 0.01 lb/lb of coating solids, which is under the permitted limit. The remaining conditions have been addressed previously in this report.

MAERS

MAERS has been reviewed, no issues. See MAERS for details.

MACES

Facility information screen was updated to reflect most recent ROP number. Regulatory Summary screen was updated by adding the PPPP and DDDDD MACTS.

COMPLIANCE DETERMINATION

Based on the site inspection and data review, the facility is in compliance with MI-ROP-N2812-2015.

NAME Becky Radulski

DATE 9/24/15

SUPERVISOR 

