

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

N359238379

FACILITY: Plastic Trim International, Inc.		SRN / ID: N3592
LOCATION: 935 AULERICH ROAD, EAST TAWAS		DISTRICT: Saginaw Bay
CITY: EAST TAWAS		COUNTY: IOSCO
CONTACT:		ACTIVITY DATE: 01/20/2017
STAFF: Sharon LeBlanc	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: unannounced, scheduled site inspection for minor source. Recent turnover in environmental staff at facility. Record keeping issues noted have been resolved as of time of report preparation.sgl		
RESOLVED COMPLAINTS:		

On Friday, January 20, 2017, an unannounced, scheduled site inspection was conducted by AQD District Staff at the Plastic Trim International, Inc. Facility (SRN N3592). The facility is located in the East Tawas Industrial Park, 935 North Aulerich Road, East Tawas, Iosco County, Michigan. One Permit to Install (PTI) 46-92 and one General Permit 305-02 are associated with the facility. The referenced permits were approved on November 24, 1992 and December 30, 2002, respectively.

The facility was in operation upon arrival, and District Staff met with Mr. Jerry Fitch (Health & Safety Specialist) and Mr. Jeremy Coulter (Quality Manager), who provided a tour and answered questions regarding facility operations.

Site inspection activities were conducted with the intent of confirming the operational status of the permitted equipment and that monitoring/reporting activities were being conducted per the referenced permit and applicable exemptions. The last site inspection was conducted on July 22, 2014.

FACILITY DESCRIPTION

The subject site is located in the East Tawas Industrial Park at 935 N. Aulerich Road. A review of the limited files for the facility indicated that there had been a Starboard Industries Plant at 706 9th Ave, Tawas City. The 9th Ave facility (B4052) had a permitted co-extrusion line (Permit no. 1151-92) that was moved to the East Tawas Plant location. The referenced permit was voided on December 30, 2002.

Activities at the site include injection molding and automotive trim molding processes. The facility has three co-extrusion lines (referred to as lines #3, #4, and #5), which form/mold flat steel from rolls, clean the metal surface, apply and cure adhesive applied to the metal, and ultimately applying a PVC coating. The applied adhesive is cured under a hood/vent. The coating station uses a dry filter which is changed out and properly handled for disposal by a licensed waste disposal facility.

In addition the facility also has:

- A plastic extrusion line for service parts referred to as the "service line" (line #7).
- A hopper-dryer unit that warms plastic pellets to 190 degrees to remove moisture prior to use/molding.
- A hot stamp, which heats foil and bonds it to the plastic. This unit is completely enclosed as the unit is temperature sensitive.
- A waste water neutralizer that treats waste water generated by the facility prior to disposal into the sewer system.
- A robotic machining unit.
- An evaporator for mop water (permitted).
- A parts washer in the maintenance area.
- NG heaters, and a

- New central cooling unit to pump cold water to cool equipment.

FEDERAL REGULATIONS

Based on emission limits, the facility is a minor source of criterial pollutants (VOCs) with annual limits of 10 ton/year per coating line. A review of potential federal regulations did not identify any regulations that have been delegated to AQD at this time, but did identify some that may be of interest to the facility at this or a future date includes:

- 40 CFR Part 63, Subpart MMMM – Surface Coating of Misc. Metal Parts. These regulations apply to source located at a major source or who are a major source of HAPS.
- 40 CFR Part 63, Subpart PPPP – Surface Coating of Plastic Parts and Products. These regulations apply only to major sources of HAPS.
- 40 CFR Part 63 Subpart JJJJJJ – Area Sources Industrial, Commercial and Institutional Boilers.
- 40 CFR Part 60 Subpart ZZZZ – NESHAP for Reciprocating Internal Combustion Engines (RICE)
- 40 CFR Part 60 Subpart IIII or JJJJ – RICE MACT

PERMITS

Permits for the facility were issued to Starboard Industries, Inc. and ASC Exterior Technologies. An internet search provided limited information and indicated that Starboard Industries was founded in 1970. The facility presently operating as Plastic Trim International, Inc. is a subsidiary of the Minth Group, Ltd. On November 23, 2016, Minth North America, notified AQD District Office of ownership and operational control transfer of the facility and associated permits to Plastic Trim International (copy in file)

AQD records indicate that there are two active permits for the facility. Permit 46-92 was issued on November 24, 1992 to Starboard Industries Inc. for a water evaporator installed onsite. District Staff confirmed that the unit was still onsite. Facility staff reported that the EU is being evaluated for removal and replacement with an oil-water separator.

General Permit to Install 305-02 was issued to ASC Exterior Technologies on December 30, 2002 was issued for installation and operation of up to three coating lines. The referenced permit allows for installation of new and replacement of existing coating lines without permit as long as all the appropriate applicability criteria are met for the general permit.

In addition to the two referenced active permits, one voided permit (Permit 1119-92) for a co-extrusion process was voided on December 30, 2002. Two co-extrusion line permit applications (lines #2 and #3) (30-02 and 29-02) were voided on January 22, 2003.

EXEMPTIONS

With the exception of the permitted co-extrusion lines and the permitted evaporator, process equipment onsite was not noted to be venting emissions into the environment only into the general work environment and would appear to be exempt from permitting under Rule 201.

Exemptions that may be appropriate for the facility and the existing unpermitted equipment include:

- Rule 280 (2)(b) & (c) – for comfort air conditioning or ventilating systems; and natural draft hoods or ventilation not designed or used to remove air contaminants released or generated by specific equipment.
- Rule 281 (2) (k) – Aqueous based parts washers
- Rule 282 (2) (b)(i) – Space heaters using sweet NG and with a rated heat input of no greater than 50,000,000 BTU/hr.
- Rule 283 (2)(b) –Laboratory Equipment

- Rule 283 (2)(d) – Equipment for the inspection of wood, metal or plastic products
- Rule 285 (2)(a) – Routine maintenance, parts replacement or other repairs considered to be minor and relocation of process equipment within the same geographical site as long as the activities do not involve any appreciable change in the quantity, quality, nature or impact of the emission of air contaminants.
- Rule 285 (2)(l)(i) – Equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning or extruding either hot or cold metals.
- Rule 286 – Plastic processing equipment.
- Rule 287 (2)(c) – Surface coating line if less than 200 gallons/month.
- Rule 290 – Emission units with limited emissions.

COMPLIANCE HISTORY

Only one letter of violation of record for the facility. The referenced document was issued on February 25, 2002 for unpermitted co-extrusion lines. Permit applications for the referenced emission sources were received by Permits on January 30, 2002. In addition, the facility provided back up documentation with regards to VOC emissions associated with the three co-extrusion lines being operated onsite.

No complaints are of record for the facility.

COMPLIANCE EVALUATION

Operational Status – During the facility tour the facility was in production with most phases of process activities ongoing. No visual emissions or accumulated particulate matter were noted at the work stations.

Material Usage Rates – This facility is predominantly a fabrication facility with production based on orders. No material usage restrictions are associated with the present active permits for the site. Waste coatings and reducers associated with the co-extrusion lines are reported to be collected and stored in closed containers for pick up and disposal by a licensed disposal company in compliance with the general permit for the equipment.

Emission Points/Limits - Emission points identified during site inspection were limited to stacks/vents associated with the water evaporator and adhesive curing area for co-extrusion line. Emissions from the co-extrusion line adhesive curing section of the line are captured by a hood(s) (seven for the three lines), and vented through a point(s) on an exterior wall (rather than through the roof), the piping then turns skyward and vents unobstructed at a height in compliance with the permit.

No vapors were noted at either emission point. Drives associated with the facility were paved and clean. No visible emissions were noted from other equipment operating at the time of the inspection.

Operational Parameters – The existing co-extrusion lines make use of dry filters for particulate control and HVLP spray or equivalent technology for better transfer efficiency and is in compliance with the permit conditions.

With respect to the SAMSCO water evaporator onsite. The unit had been emptied and was down for cleaning. Daily records were kept manually, and appear to be in proper order.

Fluids are transported from the facility floor pit(s) and transferred to the evaporator for processing. Operating conditions for the unit include a not to exceed operating temperature of 220 degrees F, and equipping and maintaining the water evaporator with a high temperature and high level indicator as well as primary and secondary low level indicators. According to facility staff the evaporator has the required safeties, which are checked along with the operating temperatures during the scheduled cleanouts and safety checks. A 3,000-gallon tank is located in a separate building to store any un-evaporated liquids/sludge, which are disposed of through a licensed disposal service.

Note that the facility does not have a thermal or catalytic oxidizer onsite, and from data maintained by the facility one is not required to meet permit limits of <10 tons of VOC emissions per year.

Equipment Maintenance – Review of the permit(s) did not identify requirements for recordkeeping associated with equipment maintenance. Equipment is kept in proper operating condition to maintain production levels and is in general compliance with general permit conditions.

Monitoring and Testing – As previously indicated, the facility monitors the operating temperature of the SAMSCO water evaporator, as required by permit. VOC testing requirements are upon request of DEQ-AQD. No testing has been requested to date.

Record Keeping and Reporting – Records maintained by the facility for the SAMSCO water evaporator include a handwritten log sheet completed indicating the startup and shut down of the unit as well as the volume of liquids (in gallons) being treated. The log sheets are maintained in a file cabinet in the evaporator room. Manifests are also maintained by the facility for materials transported offsite for disposal. Permit 46-92 requires monthly totals be kept, monthly totals are reported at the bottom of each log sheet.

The facility maintains records of all coatings, reducers and solvents purchased/used as well as emissions on a monthly and 12-month rolling average. A copy of the records were provided indicating material use and VOC emissions – totals reported indicated emissions well below the 30 ton per year limit for all three lines. VOC 12-month rolling total emissions for all three lines with only a couple exceptions were reported to range between 10 and 15 tons for the period of January 2015 thru January 2017.

It should be noted at the time of the inspection that personnel changes had recently occurred and records were incomplete for the months of November and December 2016. Those records have since been updated by existing staff. In addition, it appears that the facility sometime after the 2014 site inspection failed to continue with material use and emissions recordkeeping for each line on a monthly basis. The present staff is in the process of correcting the issue, and has committed to providing a monitoring plan for the individual lines for staff approval and implementation by the end of the quarter.

Note that in lieu of the emission calculation log sheet provided in the general permit, the facility has developed an acceptable excel spreadsheet to maintain their monthly and 12-month emission total records on.

SUMMARY

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Based on the information collected during the January 20, 2017, site visit, it appears that the facility (area source) is being operated in general compliance with its PTIs. Issues regarding recordkeeping for individual coating lines are anticipated to be resolved by the end of March. sgl

NAME Sharon Webster DATE 3/13/17 SUPERVISOR C. Hill