

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

N680348504

FACILITY: Dayco Products LLC		SRN / ID: N6803
LOCATION: 1799 Gover Parkway, MOUNT PLEASANT		DISTRICT: Saginaw Bay
CITY: MOUNT PLEASANT		COUNTY: ISABELLA
CONTACT: David Summers , EHS Coordinator		ACTIVITY DATE: 03/08/2019
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

On March 8, 2019 Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) met with David Summers of Dayco. David is newly responsible for Environmental, Health, and Safety at the facility. His hire date was Dec 10, 2018. The previous contact, David Milbourne is no longer with Dayco. The site has a "General Coating Line" permit 3-05 and a hazardous air pollutants (HAP's) opt-out permit 20-00C.

The facility is part of the automotive industry and makes metal vibration dampening parts for engines. Historically, the facility has had several booths but now it is down to four. Weightbond is the term used for the type of operation in one booth that uses solvent based adhesives. The term finish coat is used to reference the three booths using water-based materials.

We went out into the facility production area. The west end had a booth called Gen V (EU10), the next one heading east is Multi Line (EU7) and directly south is Multi Line (WB1) which is the booth using weightbond material, east of Multi Line (EU 7) is Pstar (EU2). All were being used at the time. We spoke with the area manager who confirmed the materials have not changed nor have the applicators. All filters were in place at the time. The remaining equipment in the production area largely consists of machining operations prior to parts getting coated. The machining operations involve metals and are all internally exhausted. Therefore, they would be exempt from permitting via the old exemption of rule 285 (I) (vi) (B) as the equipment was installed prior to permit exemptions being changed on December 20, 2016. Some surface preparation of metal parts is conducted using an aqueous solution of Clean & Bond 2086 Lo Foam. The material has a pH of 10.5 at full strength and Dayco is using it at 5%. The prep is obviously not an acid solution. External exhaust is used. The old exemption rule 285 (I)(iii) would apply for surface preparation of metals by use of aqueous solutions, except for acid solutions, as the installation was prior to permit exemptions being changed on December 20, 2016.

We then went back to the office area. We discussed the Michigan Air Emissions Reporting System (MAERS) as it was the first time David would be preparing and submitting Dayco's report. He had attended the class put on by the DEQ but had some questions, so we discussed the basics and some specific points of interest to a first-time user.

A records review was the next step. Records were kept for the individual booths and levels were nowhere close to the per booth limits of 2,000 pounds of VOC per month or 10 tons per year. Records for hazardous air pollutants were being kept too. I pointed out one quirk to David. The records showed the amount of HAPs was greater than that of VOCs. This situation likely results from ranges of component chemicals being provided on safety data sheets and the high end of those ranges being used in HAPs calculations. I suggested he contact the material suppliers to get more specific information. Even though being calculated on the high side, the levels of both individual HAPs, as well as combined HAPs, are extremely low. What was lacking was any calculations showing the totals of VOC, totals per booth, total HAPs, and individual HAPs on a 12-month rolling time period. I explained to David the data was there, he just needed to compile it into 12 month rolling time periods. I gave him a deadline of March 22, 2019 to allow him time to focus on the MAERS submittal which had a deadline of March 15, 2019.

On March 22, 2019 David provided 12-month rolling total VOCs, total HAPs, and individual HAP calculations which clearly indicated the facility was well under limits. In fact, for all coating lines combined, there was less than two tons of VOC emissions. What was lacking was a rolling total for each individual line where the limit is 10 tons per 12 month rolling time period. Clearly the data is available and there is no concern of limit violations. This was pointed out to David so he could add it to the company records.

On April 4, 2019 David sent screen shots of the VOC emissions per line based on the latest 12 month rolling time period. As expected, the emissions were well below the limit of 10 tons per line.

The facility is considered in compliance.

NAME JB. Withapp

DATE 4-12-19

SUPERVISOR C. Hall