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

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FACILITY: SUNSET ENTERPRISES HOLDINGS, LLC		SRN / ID: P0661
LOCATION: 2735 20TH STREET, PORT HURON		DISTRICT: Warren
CITY: PORT HURON		COUNTY: SAINT CLAIR
CONTACT: Zachary Jacques , Operations Manager		ACTIVITY DATE: 06/03/2021
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled On-site Inspection		
RESOLVED COMPLAINTS:		

On June 03, 2021, I conducted a scheduled on-site inspection at Sunset Enterprise Holdings, LLC, (Sunset) located at 2735 20<sup>th</sup> Street, Port Huron, Michigan 48060. The purpose of the 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 Administrative Rules, and the facility's Permit to Install No. 183-15. During the preinspection meeting, I met with Mr. Zachary Jacques (Zach), Operations Manager and facility contact. Mr. Jacques accompanied me during the walk -through inspection. I also met with Ronald Jacques, President, and Brian Jacques, Plant Manager.

PTI No. 183-15 was also issued as a synthetic minor permit to opt the facility out of the Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) requirements. This stationary source is not considered a major source of Hazardous Air Pollutant (HAP) emissions because the company has agreed to accept facility-wide single HAP and combined/aggregate HAPs emission restrictions, supported by monthly 12-month rolling total/s recordkeeping requirements, to demonstrate continued compliance as a HAP synthetic minor facility. Under PTI No. 183-15, FG-Facility, the facility is restricted to any single HAP emission regulated by the federal Clean Air Act, Section 112 to 8.9 tons per year and combined HAPs (aggregate HAPs) to 22.4 tons per year. The Volatile Organic Compounds (VOCs) are also restricted to 89.9 tons per year (tpy).

To comply with the COVID-19 Emergency AQD Field Inspection Guidance Update (June 2020), the inspection was announced and scheduled. I set up the inspection via a telephone call to Brian Jacques who referred me to Zach. At the site, no one was wearing mask and I did not get a temperature check. I entered the facility wearing a face mask, safety glasses, hard hat, and safety shoes. Following AQD guidance, all recordkeeping information were obtained through email instead of obtaining printed copies during inspection.

The facility coats automotive interior plastic parts and medical-use (nonautomotive specialty products) specialty products parts. The applicable

requirements in PTI No. 183-15 are under the flexible group, FG-Coating. In addition, the opt-out/source-wide applicable requirements are under FG-Facility. FG-Coating includes 3 coating lines (EU-CoatingLine-01, EU-CoatingLine-02, and EU-CoatingLine-03). For EU-CoatingLine-01 and EU-CoatingLine-02, each line consists of one (1) flame treat/CO2 pre-treatment cell, one (1) manual booth, two (2) automatic paint booths, flash-off area, and one (1) natural gas-fired conventional oven. EU-CoatingLine-03 consists of one (1) manual booth, flash-off area, and one (1) natural gasfired conventional oven (shared with EU-CoatingLine-02) or natural gasfired batch oven. During walk-through inspection, I observed that each spray booth has two applicators, for an easy transition between water based and solvent based coatings (basecoat, clear coat, and primer), but only one is used at a time. I observed that each booth has a two-stage particulate booth filters for particulate emissions control. According to Zach, emissions from purge and clean-up solvents and the paint mix room are included in the calculations for VOC and HAPs emissions.

The facility submitted a spreadsheet of coating use records that included VOC and HAPs monthly and monthly 12-month rolling total emissions. Per PTI No. 183-15, special condition FG-Coating (I.1), the submitted recordkeeping showed the highest monthly 12-month rolling total VOC emission rate for EU-CoatingLine-01 from January 2020 through April 2021 occurred in April 2021 at 3.6265 tons per year (tpy) and less than the 40.0 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.2), the submitted recordkeeping showed the highest monthly 12-month rolling total VOC emission rate for EU-CoatingLine-02 from January 2020 through April 2021 occurred in July 2021 at 6.2924 tons per year (tpy) and less than the 40.0 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.3), the submitted recordkeeping showed the highest monthly 12-month rolling total VOC emission rate for EU-CoatingLine-03 from January 2020 through April 2021 occurred in September 2021 at 0.6291 ton per year (tpy) and less than the 10.0 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.4), the submitted recordkeeping showed the highest monthly 12-month rolling total Dibasic Ester emission rate from January 2020 through April 2021 occurred in March 2020 at 0.0267 ton per year (tpy) and less than the 2.9 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.5), the submitted recordkeeping showed the highest monthly 12-month rolling total VOC emission rate for Ethylbenzene from January 2020 through April 2021 occurred in February 2020 at 0.0303 ton per year (tpy) and less than the 4.6 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.6), the submitted recordkeeping showed that the 8-hr. shift average of Isobutyl Acetate emission rate from January 2020 through April 2021, were mostly at less than 20 pounds/8-hour shift and less than the 153.6 pounds permit limit. Per PTI No. 183-15, special condition FG-Coating (II.1), the submitted recordkeeping showed the VOC content of air-dried coatings ranged from 0.72 through 4.49 lb./gal. as

applied and less than the 4.5 lb./gal. permit limit. Per PTI No. 183-15, special condition FG-Coating (II.2), the submitted recordkeeping showed the adhesion promoter VOC content is 4.59 lb./gal. as applied and less than the 4.8 lb./gal. permit limit. Per PTI No. 183-15, special condition FG-Coating (II.3), the submitted recordkeeping showed the non-automotive specialty coating VOC content is 6.32 lb./gal. as applied and less than the field for the submitted record showed the non-automotive specialty coating VOC content is 6.32 lb./gal. as applied and less than the specialty coating VOC content is 6.32 lb./gal. as applied and less than the specialty coating VOC content is 6.32 lb./gal. as applied and less than the specialty coating VOC content is 6.32 lb./gal. as applied and less than the specialty coating VOC content is 6.32 lb./gal. as applied and less than the specialty coating VOC content is 6.32 lb./gal. as applied and less than the specialty coating VOC content is 6.52 lb./gal. as applied and less than the specialty coating VOC content is 6.52 lb./gal. as applied and less than the specialty coating VOC content is 6.52 lb./gal. as applied and less than the specialty coating VOC content is 6.52 lb./gal. as applied and less than the specialty coating VOC content is 6.51 lb./gal. as applied and less than the

monthly 12-month rolling total Cumene, individual and aggregate HAPs. containing material, monthly Cumene, individual and aggregate HAPs, and FG-Facility (VI), the facility kept records of gallons of coatings, and HAPs and less than the 1.4 tpy permit limit. Per PTI No. 183-15, special condition January 2020 through April 2021 occurred in February 2020 at 0.0187 tpy the highest monthly 12-month rolling total Cumene emission rate from 8.98 tpy permit limit. Per PTI No. 183-15, special condition FG-Facility (I.4), through April 2021 occurred in March 2020 at 9.9333 tpy and less than the 0202 VianneL month for a consistion to the mission rate from January 2020 limit. Per PTI No. 183-15, special condition FG-Facility (I.3), the highest occurred in January 2020 at 0.5303 tpy and less than the 22.4 tpy permit aggregate HAPs emission rate from January 2020 through April 2021 condition FG-Facility (I.2), the highest monthly 12-month rolling total tpy and less than the 8.9 tpy permit limit. Per PTI No. 183-15, special emission rate during this time frame occurred in February 2020 at 0.1613 2020 through April 2021. The highest monthly 12-month rolling total Xylene showed Xylene has the highest individual HAP emission rate from January No. 183-15, special condition FG-Facility (I.1), the submitted records emission rates, and monthly 12-month rolling total emission rates. Per PTI VOC contents, monthly VOC, and applicable components of coating mass the facility kept records of Safety Data Sheets, gallons of material used, continuous basis. Per PTI No. 183-15, special condition FG-Coating (VI), better transfer efficiency, and records the oven temperature on a in place at the booths with no gaps, the facility using HVLP applicators for PTI No. 183-15, special condition FG-Coating (IV.1, 2, & 3), I observed filters recovered and disposed properly, and spent filters disposed properly. Per the coatings/solvent in closed containers, purge and clean up solvents are Per PTI No. 183-15, special condition FG-Coating (III.1, 2, & 3), I observed

The facility appeared to be in compliance with the applicable requirements in PTI No. 183-15 and I did not find any noncompliance issues during the walk-through inspection.

**JMAN** 

SUPERVISOR

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