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

B880173060		
FACILITY: PPG INDUSTRIES, INC.		SRN / ID: B8801
LOCATION: 961 DIVISION ST, ADRIAN		DISTRICT: Jackson
CITY: ADRIAN		COUNTY: LENAWEE
CONTACT: Jason Nowak , Regional Environmental Manager - Midwest		ACTIVITY DATE: 07/29/2024
STAFF: Brian Merle	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled, announced full compliance evaluation.		
RESOLVED COMPLAINTS:		

Facility Contact

Jason Nowak, Regional Environmental Manager – Midwest

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Purpose

On July 29th, 2024, an announced scheduled compliance inspection was conducted at PPG Industries, 961 Division Street, Adrian, Michigan. The purpose of the inspection was to determine the facility's compliance status with applicable federal and state air pollution regulations, particularly with the Michigan Natural Resources and Environmental Protection Act 451 of 1994, Part 55, Air Pollution Control and the administrative rules, and the conditions of Permit to Install (PTI) No. 196-04H.

Facility Location

The facility is located in Adrian, MI. The facility is near other industrial sources, as well as residential homes directly across the street from the facility.

Facility Background

The facility was last inspected September 8th, 2020, and was found to be in compliance. Since then, the facility was issued a new permit on October 12th, 2021. The facility primarily produces adhesives and sealants for the automotive industry, with some other industrial applications.

Regulatory Applicability

The facility operates under PTI No. 196-04H, which is a facility wide synthetic minor opt-out permit specifically for HAPs and VOCs.

Arrival

I notified Jason of my intent to inspect the facility on Tuesday, July 23rd. I also provided my list of requested records. These were provided on July 25th.

I arrived at the facility at 8:59 AM and signed in at the guest entrance. There I met with Jason, Dana Woychik, Plant Manager, and Jeff Pajik, EHS manager for the facility. We proceeded into the facility and headed to the conference room.

Pre-inspection Meeting

I began the meeting by asking what had changed since the previous inspection in 2020. Jason explained that the only change was the equipment permitted under PTI No. 196-04H for the seven blending tanks under FGBLENDTANKS. Dana then gave some background for the facility. They employ 75 employees and operate 24/5.

They also explained how they currently have a permit application under review by AQD to add an additional storage silo, as well as allow flexibility for what mixers vent to what dust collector. In the future, they plan to modify their permit so they can update some of their dust collectors.

I then asked about the status of Dust Collector 5. On January 18, 2024, the fire suppression system in this dust collector activated and brought it offline. The facility requested permission from AQD to vent the mixers for this dust collector to a different one. It was the opinion of AQD that this would be a permit violation. The facility has since repaired the dust collector, and in their permit application requested that there be flexibility for where their mixers exhaust.

We then proceeded with the inspection, focusing on the equipment in the permit.

Inspection

The required PPE for the facility included safety glasses, safety boots, hard hat, and lab coat. We were joined by Brett, the maintenance personnel responsible for performing the weekly pressure drop readings of each dust collector.

We went outside and first observed the building housing the blending tanks. On the way, we passed Dust Collector #9, which was reading 2.7". This dust collector is for their trash compactor and is not in the permit. The blending tanks in this building receive product from the adjoining building.

Next, just outside the blending tank building, are the facility's "powder silos" or day bins. This is where the facility plans to add a large silo. These silos are controlled by Dust Collectors 11, 12, and 13. There are differential pressure gauges on these collectors, but they are on top of the silos and cannot be read from the ground. Instead, the pressure can be read digitally from the facility. The digital monitors also automatically shake the collectors when the differential pressure gets too high.

We then went to observe Dust Collector #8, which was reading at 10" at the time of the inspection. The facility explained that the collector is shut down on Friday and when it is started up on Monday, they shake it out. The mixers associated with this dust collector had not operated that day, and therefore the collector had not been shaken. Later in the inspection, maintenance had shaken the collector and I was shown a picture of the gauge sent by maintenance which showed 3.3".

The next dust collector we observed was Dust Collector #10, which read 1.1". Dust Collector #1, #5, and #2 all read at 0.5". Dust Collector #4 rad at 1.1". All dust collectors are outside, with their gauges inside. Following the observation of all the dust collectors, we went inside the facility and I was shown all of the mixers. We then returned to the conference room.

Post-inspection Meeting

In the conference room, Jason pulled up the facility's online SDS database and showed me an example. This satisfies condition SC VI.4 under FGMIXERS. Jason also went though the facilities emission tracking spreadsheet, which he provided on July 25. I also asked some follow up questions about my inspection, which included the information about Dust Collector #8.

Following the meeting, I was escorted out of the facility. I thanked everyone for their time and left at 10:00 AM.

Records Review

The facility provided an excel document titled "Att B1 – TAC Analysis April 2024 – Adrian Monthly Air Emission Tracking Rev 4-19-2024". The spreadsheet contained multiple sheets named Notes, Directions & Assumptions, Production Emission Calcs, TACs Data, Blend Tank Emission Calcs, RM Silo Emission Calcs, TAC Emissions, TAC Analysis Rule 227(1)(a), TAC Analysis Rule 227(1)(b), TAC Modeling PAI Rule 227(1)(c), PAHs, 12-Month Rolling, and data 11-1-2023.

The only records necessary to determine compliance for the facility are Production Emission Calcs (Attachment 1) and Blend Tank Emission Calcs (Attachment 2)

The facility also provided the pressure drop readings of their dust collectors for the week of May 20 (Attachment 3).

Additional questions were asked of the facility by email, with the last being received on August 9 (Attachment 4).

Permit Conditions Review

FGMIXERS

SC I.1 23.32 tpy VOC limit based on a 12-month rolling time period. The facility provided rolling emissions for 2023 and until June 2024 (Attachment 1). The highest month was January 2023 with 3.75 tons of VOCs. They are in compliance with this condition.

SC I.2 2.25 tpy PVC powder limit based on a 12-month rolling time period. The facility provided rolling emissions for 2023 and until June 2024 (Attachment 1). The highest month was January and April 2024 with 0.0036 tons of PVC power. They are in compliance with this condition.

SC I.3 0.10 pounds of PM per 1,000 pounds of exhaust gasses, calculated on a dry gas basis, determined hourly, for Dust Collectors 1, 2, 4, 5, 8, and 10. I inquired with the facility to see if they keep additional records for this condition, and they do not (Attachment 4). The facility complies with SC VI.2 and SC VI.3, which demonstrate compliance with this condition.

SC I.4 0.012 pounds of PM per 1,000 pounds of exhaust gases, calculated on a dry gas basis, determined hourly, for Dust Collector #11. I inquired with the facility to see if they keep additional records for this condition, and they do not (Attachment 4). The facility complies with SC VI.2 and SC VI.3, which demonstrate compliance with this condition.

SC I.5 0.003 pounds of PM per 1,000 pounds of exhaust gases, calculated on a dry gas basis, determined hourly, for Dust Collector #12. I inquired with the facility to see if they keep

additional records for this condition, and they do not (Attachment 4). The facility complies with SC VI.2 and SC VI.3, which demonstrate compliance with this condition.

SC I.6 0.009 pounds of PM per 1,000 pounds of exhaust gases, calculated on a dry gas basis, determined hourly, for Dust Collector #13. I inquired with the facility to see if they keep additional records for this condition, and they do not (Attachment 4). The facility complies with SC VI.2 and SC VI.3, which demonstrate compliance with this condition.

SC II.1 145,000 tpy limit of solids processed based on a 12-month rolling time period. The highest month was January 2024, with 36,755.31 tons (Attachment 1). They are in compliance with this condition.

SC II.2 4,500 tpy limit of Polyvinyl chloride (PVC) powder processed based on a 12-month rolling time period. The highest month was December 2023, with 1,437.38 tons (Attachment 1). They are in compliance with this condition.

SC II.3 6,000,000 gallons per year limit on VOC processes, including cleanup solvents, based on a 12-month rolling time period. The highest month was December 2023, with 123,542.59 gallons (Attachment 1). They are in compliance with this condition.

SC II.4 50,000,000 gallons per year limit on adhesives and sealant produced, based on a 12-month rolling time period. The month with the highest production was January 2023 with 5,615,794.33 gallons (Attachment 1). They are in compliance with this condition.

SC III.1 All waste from the manufacturing process, including dust from the dust collectors, is captured and stored in closed containers and is disposed of off site by a contractor. They are in compliance with this condition.

SC IV.1 The facility does not operate their mixers unless the associated dust collectors are operating. They are in compliance with this condition.

SC IV.2 All dust collectors have a gauge measuring the pressure drop across each dust collector. They are in compliance with this condition.

SC VI.2 Each dust collector has a pressure drop gauge. They are in compliance with this condition.

SC VI.3 The facility performs weekly pressure drop readings for each dust collector (Attachment 3). They are in compliance with this condition.

SC VI.4 The facility maintains an online database of all Safety Data Sheets, which show the chemical composition of each mixing component. They are in compliance with this condition.

SC VI.5(a) The facility tracks gallons of each mixing material and cleanup solvents used on a monthly basis (Attachment 3). They are in compliance with this condition.

SC VI.5(b) The facility tracks the VOC content of each product mixed/made in pounds of VOC per gallon. This information is normally hidden on their spreadsheet to make viewing the data easier (Attachment 1). They are in compliance with this condition.

SC VI.5(c) Monthly VOC mass emission calculations are determined using excel (Attachment 1). They are in compliance with this condition.

SC VI.5(d) 12-month rolling VOC mass emission calculations are determined using excel (Attachment 1). They are in compliance with this condition.

SC VI.5(e) Tons of PVC processed on a 12-month rolling basis are tracked by the facility (Attachment 1). They are in compliance with this condition.

SC VI.5(f) Throughput records are maintained by the facility for addition of VOCs, solids and/or powders, in gallons (Attachment 1). They are in compliance with this condition.

FGBLENDTANKS

SC I.1 0.41 tpy VOC limit based on a 12-month rolling time period. The facility provided rolling emissions for 2024, up until June (Attachment 2). The highest month was May and June 2024 with 0.01 tons of VOCs. They are in compliance with this condition.

SC II.1 1,819,629 gallons per year limit of intermediate products processed, based on a 12-month rolling time period. The highest month so far for 2024 was June, with 160,206.42 gallons (Attachment 2). They are in compliance with this condition.

SC III.1 The blending tanks are kept sealed unless product is loaded or unloaded. They are in compliance with this condition.

SC VI.2 The facility maintains an online database of all Safety Data Sheets, which show the chemical composition of each mixing component. They are in compliance with this condition.

SC VI.3(a) The facility tracks the gallons of each product loaded into the blend tanks on a monthly basis (Attachment 2). They are in compliance with this condition.

SC VI.3(b) The gallons of intermediate products loaded into the blend tanks are determined on a 12-month rolling basis (Attachment 2). They are in compliance with this condition.

SC VI.3(c) VOC mass emission calculations are determined monthly using excel (Attachment 2). They are in compliance with this condition.

SC VI.3(d) VOC mass emission calculations are determined on a 12-month rolling basis (Attachment 2). They are in compliance with this condition.

FGFACILITY

SC I.1 The facility has an emission limit of less than 9 tpy for each individual HAP, determined on a 12-month rolling basis. No individual HAP exceeded this limit for 2023 and for January to June 2024, the extent of the data provided (Attachment 1). They are in compliance with this condition.

SC I.2 The facility has an emission limit of less than 22.5 tpy for their aggregate HAPs, determined on a 12-month rolling basis. The highest total HAPs was in January 2023, with 2.03 tons (Attachment 1). They are in compliance with this condition.

SC VI.2(a) The facility tracks the gallons of each HAP containing material used (Attachment 1). They are in compliance with this condition.

SC VI.2(b) I did not observe any data pertaining to reclaimed HAP material. The facility confirmed that they do not reclaim any HAP material on August 8 (Attachment 4). They are in compliance with this condition.

SC VI.2(c) The HAP content of each product is recorded by the facility in pounds per gallon (Attachment 1). They are in compliance with this condition.

SC VI.2(d) Individual and aggregate HAP emissions are calculated monthly, in tons (Attachment 1). They are in compliance with this condition.

SC VI.2(e) Individual and aggregate HAP emissions are calculated on a 12-month rolling basis (Attachment 1). They are in compliance with this condition.

Compliance Determination

Based on the findings of my inspection and the corresponding records review, I found this facility to be in compliance with the conditions of their permit.

NAME ______ DATE 0729/2024 SUPERVISOR _____