



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

April 6, 2017

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Jim Ulrey
Grupo Antolin - Howell
3705 West Grand River Avenue
Howell, Michigan 48855

SRN: N2198, Livingston County

Dear Mr. Ulrey:

VIOLATION NOTICE

On March 3, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of Grupo Antolin - Howell located at 3705 West Grand River Road, Howell. The purpose of this 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 Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 52-09B.

During the inspection, staff observed the following:

Violation Number	Process Description	Rule/Permit Condition Violated	Comments
1	FG-FORMINGLINE	R336.1201	No appropriate permit exemption rule found
2	FG-WATERTRIM	R336.1201	No appropriate permit exemption rule found
3	EU-SKINLINE	R336.1201	No appropriate permit exemption rule found
4	EU-PACKAGETRAY	R336.1201	PTI 52-09A for equipment voided based on company statement that equipment was removed
5	FG-REACTINMOLD	R336.1201	No appropriate permit exemption rule found
6	FG-RURTLINE	R336.1201	No appropriate permit exemption rule found
7	FG-LAMBDA967&968	R336.1201	No appropriate permit exemption rule found
8	EU-C1	R336.1201	No appropriate permit exemption rule found
9	EU-PAINT	PTI 52-09B, paragraph III.3.	MAP not completed
10	EU-PAINT	PTI 52-09B, paragraph III.4. and IV.5.	Entrance NDO is less than 0.007" WC

11	EU-PAINT	PTI 52-09B, paragraph IV.2.	Pressure test caps not available
12	EU-PAINT	PTI 52-09B, paragraph IV.4. and VI.4	Temperature recording chart inoperative
13	EU-PAINT	PTI 52-09B, paragraph VI.1. and VI.3.	VOC records not being tracked
14	EU-PAINT	PTI 52-09B, paragraph VI.5.	Differential pressure monitors not being recorded
15	FG-FACILITY	PTI 52-09B, paragraph V.1 and VI.1., VI.3.	HAP tracking not being conducted

1. FG-FORMINGLINE (aka SL2 line) is a line which produces cab components for Peterbilt trucks which consists of two different emission units with the same violation, EU-FORMING1 and EU-FORMING2. This violation is for the lack of permit for the installation of fabric filter controlled exhaust which handles the spray application of a mixture of polyol and methylene diphenyl diisocyanate (MDI). Application rates exceed those allowed in permit exemption R336.1287 and the previous use of exemption R336.1286 is inappropriate for this part of the process.

2. FG-WATERTRIM consists of two separate emission units, EU-WATERTRIM1 which services parts on the FG-FORMINGLINE and EU-WATERTRIM2 which services parts on the FG-THERMOFORM line. These devices use water to cut and trim fiberglass with MDI and plastic parts and are exhausted through the roof after a mechanical cyclone. This part of the process is separate from the product production thus the use of exemption rule R336.1286 is inappropriate; exemption R336.1285(2)(l)(vi)(c) is also inappropriate due to the lack of a fabric filter.

3. EU-SKINLINE is a multi-station device with 4 different stations vented separately through the roof. This violation is for the lack of permit for the installation of fabric filter controlled exhaust which handles the spray application of a mixture of polyol and methylene diphenyl diisocyanate (MDI).

4. EU-PACKAGETRAY was equipment issued under PTI 52-09A. Upon the application for PTI 52-09B, this equipment was included in the permit yet was later removed after email correspondence on October 14, 2015 requesting removal. Upon inspection, it was found that this device is still installed.

5. FG-REACTINMOLD is a line for producing Ford C-Max battery covers which consists of two different emission units with the same violation, EU-REACTINMOLD1 and EU-REACTINMOLD2. This violation is for the lack of permit for the installation of fabric filter controlled exhaust which handles the spray application of a mixture of polyol and methylene diphenyl diisocyanate (MDI). Application rates exceed those allowed in permit exemption R336.1287 and the previous use of exemption R336.1286 is inappropriate for this part of the process.

6. FG-RURTLINE is a line for producing trunk components for Chrysler minivans which consists of two different emission units with the same violation, EU-RURTLINE1 and EU-RURTLINE2. This violation is for the lack of permit for the installation of fabric filter controlled exhaust which handles the spray application of a mixture of polyol and methylene diphenyl diisocyanate (MDI).

Application rates exceed those allowed in permit exemption R336.1287 and the previous use of exemption R336.1286 is inappropriate for this part of the process.

7. FG-LAMBDA967&968 is a line for producing door trim components which consists of two different emission units with the same violation, EU-LAMBDA967 and EU-LAMBDA968. This violation is for the lack of permit for the installation of fabric filter controlled exhaust which handles the spray application of glue as part of the assembly process. Application rates exceed those allowed in permit exemption R336.1287 and the previous use of exemption R336.1286 is inappropriate for this part of the process.

8. EU-C1 is a new operation similar to the FG-LAMBDA967&968. This violation is for the lack of permit for the installation of fabric filter controlled exhaust which handles the spray application of glue as part of the assembly process. Application rates exceed those allowed in permit exemption R336.1287 and the previous use of exemption R336.1286 is inappropriate for this part of the process.

9. EU-PAINT is required to have a Malfunction Abatement Plan as per PTI paragraph III.3. completed and available within 60 days after commencement of the trial operation. The trial operation began sometime in mid-June of 2016. As of the inspection, a MAP had not been completed.

10. EU-PAINT PTI paragraph III.4. and IV.5. require all Natural Draft Openings (NDO's) to have a pressure drop of no less than 0.007 inches of water column ("WC) for assurance that the NDO is under negative pressure with a flow of at least 200 cubic feet per minute. At the time of the inspection, the part entrance NDO was reading 0.003"WC while trial operations were being conducted.

11. EU-PAINT PTI paragraph IV.2. requires that test caps be available for the testing of High Pressure Low Volume (HPLV) applicators. As of the inspection, test caps were unavailable.

12. EU-PAINT PTI paragraph IV.4. and VI.4. require the Regenerative Thermal Oxidizer (RTO) temperature to be constantly recorded to assure proper temperature and proper Volatile Organic Compound (VOC) and Hazardous Air Pollutant (HAP) destruction. During the inspection, it was found that the ink needle had not been installed on the circular chart recorder and thus records could not be provided to prove compliance.

13. EU-PAINT PTI paragraph VI.1. and VI.3. require the tracking of paint VOC content and VOC emissions. As of the inspection, records have not been created or made for the purpose of tracking VOC's.

14. EU-PAINT PTI paragraph VI.5. requires that the differential pressure monitors located at each NDO be recorded and maintained to ensure compliance with capture efficiency requirements. As of the inspection, records of this requirement could not be produced.

15. FG-FACILITY PTI paragraph VV.1, VI.1., and VI.3. require the tracking and recording of all HAP material and emissions in order to ensure compliance with HAP emission limits. Currently, Xylene is being used on multiple lines within the facility to clean glue lines and the paint containing HAP's has not been tracked or documented for the paint line. This information is used to ensure the facility remains below Major Source thresholds.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at the following website:

http://www.michigan.gov/deq/0,4561,7-135-3310_70487-112202--,00.html

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 27, 2017. The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If Grupo Antolin - Howell believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Grupo Antolin - Howell. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Nathan Hude
Environmental Quality Analyst
Air Quality Division
517-284-6779

NNH:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ
Mr. Brad Myott, DEQ