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

N238324107

FACILITY: DGP INC.		SRN / ID: N2383
LOCATION: 3260 FENNER ST., MARLETTE		DISTRICT: Saginaw Bay
CITY: MARLETTE		COUNTY: SANILAC
CONTACT: Chris Clark Jr. , Vice President		ACTIVITY DATE: 01/09/2014
STAFF: Gina McCann	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT:		
RESOLVED COMPLAINTS:		

I (glm) performed a scheduled inspection at DGP Inc. (N2383). The purpose of the site inspection was to determine compliance with the facility's Renewable Operating Permit (MI-ROP-N2383-2013) and air quality regulations.

Facility Description
DGP Manufactures fiberglass parts for vehicles such as buses, trucks, RV's and race cars. They also produce prototypes and custom molds. The manufacturing process consists of a pattern shop (EU-PATTERNSHOP), production area (EU-LAMINATION and EU-GELCOAT) and cleanup activities (EU-ACETONE).

Regulatory Description
DGP's potential to emit (PTE) of any single hazardous air pollutant (HAP) is equal to or more than 10 tons per year (TPY) and/or the PTE of all HAPs combined is more than 25 TPY, therefore they are major for HAPs and require an ROP. Styrene and Methyl Methacrylate (MMA) are the HAPs emitted at the facility.

Compliance Determination
I met with Chris Clark Jr., owner and Responsible Official. Mr. Clark and I reviewed records the facility is required to keep per the ROP and toured the manufacturing areas. Exhaust filters were installed, maintained and operated in a satisfactory manner. All filters were in place on the various booths. Non atomized applicators were being used to apply tolling gelcoat materials and mold resin and Bondo materials were being applied using hand layup techniques. During my inspection I also noted that waste and other associated materials used in FG-FIBERGLASS were captured and stored in closed containers.

The majority of the compliance evaluation is based on recordkeeping emissions and material usage. The following tables provide a comparison of the emission limits in the ROP and the actual emissions reported for the 12-month rolling time period ending December 2012 for emission unit EU-PATTERNSHOP.

TABLE 1 EU-PATTERNSHOP

Pollutant	Limit	Emissions
Styrene	6.0 TPY	0.94 TPY
VOC (including styrene)	278 LBS/DAY	1.00 LB/DAY
VOC (including styrene)	6.2 TPY	0.26 TPY
Acetone	500 LBS/YR	****

****Records for Acetone are not being recorded for this emission unit.**

TABLE 1A EU-PATTERNSHOP

Material ID	Limit (12-month rolling time period in lbs)	Usage (12-month rolling time period in lbs)
Tooling gelcoat	9,996	393
Mold resin	103,956	7,348
Bondo body filler	18,000	2,201
Catalyst	2,279	72

As shown the facility is in compliance with the emission limits for the pollutants and material usage limits recorded for EU-PATTERNSHOP. However, the facility is not recording acetone emissions. A violation notice was sent on January 16, 2014 for this compliance issue.

The following tables provide a comparison of the emission limits in the ROP and the actual emissions reported for the 12-month rolling time period ending December 2012 for emission unit EU-LAMINATION.

TABLE 2 EU-LAMINATION

Pollutant	Limit	Emissions
Styrene	19.8 TPY	0.89 TPY
VOC (including styrene)	1126 LBS/DAY	21.0 LBS/DAY
VOC (including styrene)	26.0 TPY	5.16 TPY
Acetone	0.6 TPY	****

******Records for Acetone are not being recorded for this emission unit.**

TABLE 2A EU-LAMINATION

Material ID	Limit (12-month rolling time period)	Usage (12-month rolling time period)
Gelcoat	59,040 LBS	0 LBS
Resin	531,360 LBS	280,993 LBS
Catalyst	10,842 LBS	4,408 LBS
Patch Booster	800 LBS	154 LBS
Polyvinyl Alcohol (PVA)	504 GAL	3 GAL
Lacquer Primer	300 GAL	10 GAL
Thinner	600 GAL	14 GAL

As shown the facility is in compliance with the emission limits and material usage limits for the pollutants recorded for EU-LAMINATION. However, the facility is not recording acetone emissions. A violation notice was sent on January 16, 2014 for this compliance issue.

The following table provides a comparison between the emission limits for EU-GELCOAT in MI-ROP-N2383-2013 and the actual emissions reported for the 12-month rolling time period ending December 2012 for emission unit EU-GELCOAT.

TABLE 3 EU-GELCOAT

Pollutant	Limit	Emissions
Styrene	16.0 TPY	0.45 TPY
VOC (including styrene and MMA)	345 LBS/DAY	10.0 LBS/DAY
VOC (including styrene and MMA)	26.0 TPY	5.77 TPY

TABLE 3A EU-GELCOAT

Material ID	Limit (12-month rolling time period)	Usage (12-month rolling time period)
Gelcoat	156,000 LBS	90,103 LBS
Catalyst	3,000 LBS	921 LBS
Primer Surface	996 GAL	31 GAL

As shown the facility is in compliance with the emission limits for the pollutants and material usage limits recorded for EU-GELCOAT.

The facility is also required to record the acetone emission calculation determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month for the entire facility. This table compares the emission limits with the actual emissions recorded for the 12-month rolling time period ending December 2012.

TABLE 4 EU-CLEANUP

Pollutant	Limit (TPY)	Emissions (TPY)
Acetone	24.0	0.15
VOC	10.1	2.55

The emissions did not exceed the emission limits in the ROP.

The facility was not in compliance with all aspects of their ROP at the time of my inspection. A Violation Notice was send on January 16, 2014 with a response date of February 7, 2014.

NAME Gina R. McCann DATE 1/17/2014 SUPERVISOR C. Haas

Report For December: Actual Usages And DEQ Maximum Limits

Material	Actual 12 Month Usages In Pounds	Maximum Allowed 12 Month Usage In Pounds	Highest Calendar Day Usage In Pounds	Maximum Allowed Calendar Day Usage In Pounds	Actual 12 Month Usages In Gallons	Maximum Allowed 12 Month Usage In Gallons	Percent Of Maximum Usage	Cautions If Over 0.87 Of Maximum Allowed
Gel Coat	90,103	156,000	71				58%	
Catalyst For Gel Booth	921	3,000					31%	
Quick Fill *					31	996	3%	
Tooling Gel	393	9,996					4%	
Mold Resin	7,348	103,956					7%	
Bondo	2,201	18,000	10	1,080			12%	
Catalyst For Pattern Shop	72	2,279	2	44			3%	
Acetone For Clean Up	7,193	24,000					30%	
Lamination_Gel_Coat								
Lamination_Resin	280,993	531,360	1,431	5,460			53%	
Lamination_Catalyst	4,408	10,842	16	108			41%	
Patch Booster	154	800	1	96			19%	
PVA *					3	504	1%	
Primer *					10	300	3%	
Thinner *					14	600	2%	
Mold Release *					66	200	33%	

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Actual Emissions Compared To DEQ Maximum Limits

Emission Unit	12 Month VOC Emissions In Tons	Maximum 12 Month VOC Emission Limit (Tons)	Percent Of Maximum Emissions Allowed	Pounds Per ~~Month~~ VOC (Virgin Acetone)	Pounds Per ~~Month~~ Virgin Acetone Limit	Highest Pounds Per Day Of VOC	Pounds Per Day Of VOC Limit	Tons Per Year Styrene Emissions	Tons Per Year Styrene Emissions Limit	Pounds Per Year Misc. Acetone Emission	Pounds Per Year Misc. Acetone Emission Limit
Gel_Booth	5.7713	26.00	22%			10	354	0.45	16		
Lamination_Booth	5.1600	26.00	20%			21	1126	0.89	19.8		1200
Pattern_Shop	0.2577	6.20	4%			1	278	0.94	6		500
Manual_Application_Area											
Acetone_For_Clean_Up	2.5465	10.10	25%	307	24000						
Adhesive											

* Denotes Material Usage In Gallons

This Report Contains 12 Months Of Rolling Data!

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Work Calculations

Emission Units	Material	Rolling Annual Usages	Styrene Content	MMA Content	Styrene Emission Factor	Styrene Emission Factor Basis	MMA Emission Factor	MMA Emission Factor Basis	VOC Content	VOC Content Basis	Annual Emissions
Gel_Booth	Oxford	2521.70	24.00%	4.00%	214	UEF Gelcoat Application	60	UEF Gelcoat Application	0.00%	MSDS	0.1727
	Chevy Frost	667.50	24.00%	4.00%	214		60		0.00%	MSDS	0.0457
	Nose Cone	4267.26	24.00%	4.00%	214		60		0.00%	MSDS	0.2923
	Airstream Gray	0	27.00%	4.00%	240		60		0.00%	MSDS	0.0000
	Sandable Gray	25774.10	28.00%	0.00%	249		0		0.00%	MSDS	1.6044
	Oshkosh Gray	3970.98	27.00%	4.00%	240		60		0.00%	MSDS	0.2978
	Black	85.57	26.00%	4.00%	231		60		0.00%	MSDS	0.0062
	Nascar Gray	0	24.40%	0.00%	214		0		0.00%	MSDS	0.0000
	Red	1176.77	25.00%	4.00%	223		60		0.00%	MSDS	0.0833
	International White	1898.34	24.00%	4.00%	214		60		0.00%	MSDS	0.1300
	Cool Gray	926.72	27.00%	4.00%	240		60		0.00%	MSDS	0.0695
	SC WHITE	47364.67	25.00%	4.00%	214		60		0.00%	MSDS	3.2445
	GRAY	1285.37	27.00%	4.00%	240		60		0.00%	MSDS	0.0964
	Blue	0	31.13%	4.35%	276		60		0.00%	MSDS	0.0000
	Light Champagne	5.92	30.00%	3.00%	267		45		0.00%	MSDS	0.0005
	Light Platinum	158.36	30.00%	3.00%	267		45		0.00%	MSDS	0.0124
	Quick Fill	320.00	14.00%	0.00%	125		0	n/a	0.00%	MSDS	0.0100
	Catalyst	921.00	0.00%	0.00%	1.00%	Air Permit	0	n/a	0.00%	Air Permit	0.0000
										Total EU-Gelcoat Emissions	6.0657
Pattern_Shop	Black Tooling Gel	5.25	36.91%	3.00%	377	UEF Gelcoat Application	45	UEF Gelcoat Application	0.00%	MSDS	0.0006
	Tangerine Tooling Gel	388.00	36.91%	3.00%	377		45		0.00%	MSDS	0.0409
	Mold Resin	7347.57	47.20%	0.00%	163	UEF Manual	0	n/a	0.00%	MSDS	0.2994
	Bondo	2201.00	22.00%	0.00%	55		0	n/a	0.00%	MSDS	0.0303
	Catalyst	71.75	0.00%	0.00%	1.00%	Air Permit	0	n/a	0.00%	Air Permit	0.0000
										Total EU-Pattern Shop Emissions	0.3712
Lamination_Booth	Lamination Gelcoat	Not Currently In Use									
	GP Resin West Lamination	232462.00	35.00%	0.00%	77	UEF Mechanical Non-Atomized	0	n/a	0	MSDS	4.4749
	GP Resin East Lamination	35639.20	35.00%	0.00%	77		0	n/a	0	MSDS	0.6861
	Gunk Resin	12891.52	30.00%	0.00%	76	UEF Manual	0	n/a	0.00%	MSDS	0.2449
	Catalyst West Lamination	3720.00	0.00%	0.00%	1.00%	Air Permit	0	n/a	0	Air Permit	0.0000
	Catalyst East Lamination	688.00	0.00%	0.00%	1.00%	Air Permit	0	n/a	0	MSDS	0.0000
	Patch Booster	154.25	77.13%	0.00%			0	n/a	0	MSDS	0.0000
	PVA	21.00	0.00%	0.00%	0	n/a	0	n/a	0	MSDS	0.0000
	Primer	107.00	0.00%	0.00%	0	n/a	0	n/a	0	MSDS	0.0000
	Thinner	91.00	0.00%	0.00%	0	n/a	0	n/a	0	MSDS	0.0000
										Total EU-Lamination Emissions	5.4059
Acetone_For_Clean_Up	Acetone	7193.00		0.00%	0				100	MSDS	0.0000
										Total EU-Cleanup Emissions	0.0000
Adhesive	A0 420 Plexus	0	0.00%	85.00%	0				0	MSDS	0.0000
	MA 1025 Plexus	0	1.00%	70.00%					0	MSDS	0.0000
										Total EU-Adhesive Emissions	0.0000

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