

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

N515374826

FACILITY: SCIENTIFIC ANGLERS 3M		SRN / ID: N5153
LOCATION: 4100 JAMES SALVAGE RD, MIDLAND		DISTRICT: Bay City
CITY: MIDLAND		COUNTY: MIDLAND
CONTACT: Joe Valley , Facilities Manager		ACTIVITY DATE: 11/14/2024
STAFF: Haley Willman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: On-site inspection to verify compliance with PTI 1002-92A		
RESOLVED COMPLAINTS:		

Summary

A scheduled inspection was completed by Air Quality Division (AQD) staff Haley Willman (HW) at Scientific Anglers in Midland, Michigan to verify compliance with Permit to Install (PTI) No. 1002-92A. Scientific Anglers manufactures fly fishing lines for global distribution. The company employs approximately 35 people and runs two 12-hour shifts, operating 24 hours a day, Monday through Friday. Applicable records were requested on November 12, 2024, and an in-person inspection was completed on November 14, 2024. During the onsite inspection details about proper recordkeeping were discussed with company staff and a new coating line was discovered, which appears to be exempt per Rule 287(c). Based on the observations from both the records and observations, Scientific Anglers appears to be in compliance.

Offsite Compliance Review

At the time of inspection, there were no open violation notices, enforcement actions, or complaints for this site. A request was sent to Joe Valley (JV), facility manager, on November 12, 2024, for records required by their PTI. The following records were requested:

For each coating applied on a monthly basis:

- Identification of the coating used
- Volatile organic compound (VOC) content in pounds per gallon coating (minus water) as received and as applied
- VOC content in pounds per gallon of reducers and catalysts
- Amount in gallons of coating as applied
- Monthly records of cleaning solvents used and reclaimed
- Monthly calculations determining total VOC emission rate in pounds and tons
- Monthly calculations determining 12-month rolling average emissions rate in tons per year of total VOCs.

JV provided the requested records the same day of the request via email. Upon review offsite of the records, all appeared to be acceptable with some minor adjustments that needed to be made, which were discussed onsite. PTI 1002-92A states they shall not exceed 2.5 pounds per hour nor 7.8 tons per year of VOCs based on a 12-month rolling average. The provided records showed the latest 12 month rolling average (November 2023-October 2024) was 2.27 tons per year and pounds per hour ranged from 0.01 to 0.08 for the same time period, both well below their permit limits.

Compliance Evaluation

The onsite inspection was completed on November 14, 2024 by AQD staff HW. HW arrived at the facility at 8:45am and departed at 9:45am. Weather conditions at the time of the inspection were rainy and cloudy, with winds 16mph from the southeast and 44°F. No offsite odors or visual emissions were noted. HW and JV discussed record keeping and how to properly calculate the total rolling time period to ensure compliance with their permit limits and set up warnings if they approach those limits. Site staff confirmed they no longer use cleaning solvents from Safety Kleen.

During the site tour, Scientific Anglers staff demonstrated the production process, which begins with a braided core that is dipped in primer. The core then passes through an oven for initial curing, followed by immersion in a coating liquid, another oven for curing, and a final oven to complete the process. At the time of the inspection, 4 coating lines were active, and 2 were not in operation. AQD staff were shown a new coating line that was recently installed and was currently in use. After following up with the company, it appears the new equipment is exempt under Rule 287(c). The provided records showed at most 90 gallons per month across all coating lines were used and is therefore less than the 200-gallon limit required to meet this exemption. Emissions from the coating process are collected and routed to a single stack. AQD staff were shown the mixing room, baghouse, storage areas of finished product, and packaging stations. The facility is classified as a true minor source for VOCs and operates under PTI No. 1002-92A.

Conclusion

Based on the observations made and records reviewed, Scientific Anglers appears to be in compliance with PTI No. 1002-92A and applicable air pollution control rules.

NAME Halcy Willman

DATE 12/03/2024

SUPERVISOR 