

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : NYLOK LLC	SRN : N5656
Location : 15260 HALLMARK Court	District : Warren
	County : MACOMB
City : MACOMB State: MI Zip Code : 48042	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Kerry Kelly
FCE Begin Date : 9/1/2020	FCE Completion Date : 8/25/2022
Comments : Based on information collected for the FY 2022 inspection, Nylok was not operating in compliance with FG-COATINGLINEA SC IV.1, FG-COATINGLINEA SC VI.8, FG-COATINGLINE SC VII.5, FG-MACT MMMM SC III.1, FG-MACT MMMM SC VI.4 and FG-MACT MMMM SC VII.6.b.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/29/2022	Stack Test	Compliance	RTO destruction efficiency and PTE capture efficiency testing for FG-COATINGLINEA, required in FG-MACT MMMM SC V.1 and 2. Report indicates the RTO VOC destruction efficiency was 97.8% and the capture efficiency of the PTE was 100% during testing. These values are within permit/MACT MMMM limits.
07/12/2022	On-site Inspection	Non Compliance	FY 2022 Inspection
05/26/2022	CAM Excursions/Exceedances	Non Compliance	Semiannual CAM Report of Excursions and Monitor Downtime required in 40 CFR 64.9(a)(2)(i) and (ii). No excursions or monitoring downtime reported. Based on review of available records for calendar year 2021 for this source, there were RTO temperature excursions between August 18, 2021 and August 20, 2021.

Activity Date	Activity Type	Compliance Status	Comments
05/25/2022	MACT (Part 63)	Non Compliance	Semi-annual report required in 40 CFR 63.3920(a). Report contains information required in 40 CFR 63.3920(a) and states the compliance option with add-on control was used for each coating operation, controlled and uncontrolled. Use of the emission rate with add-on control for both controlled and uncontrolled coating operations is allowed in 40 CFR 63.3961(a). Emission rates submitted with the report for the reporting period indicate the facility is meeting the organic HAP emission rate in 40 CFR 63.3890 (b)(1). Information gathered during the FY 2022 inspection indicate there were RTO temperature deviations between August 18, 2021 and August 20, 2021. These temperature deviations were not reported.
05/24/2022	ROP SEMI 2 CERT	Compliance	Semi-Annual Report required in R 336.1213(3)(c)(i). The submitted report contains the information required in R 336.1213(3)(c)(i). The report indicates all monitoring & recordkeeping requirements in the ROP were met & no deviations occurred. Based on my knowledge of the source, the information in the report to be accurate.

Activity Date	Activity Type	Compliance Status	Comments
05/23/2022	ROP Annual Cert	Compliance	Deviations previously reported in ROP Semi 1 Cert for January 1, 2021 - June 30, 2021. There is no record of the review of ROP Semi 1 Cert for January 1, 2021 - June 30, 2021 logged in MACES. The deviations reported are for FG-COATINGLINEA SC IV.1 and IX.1 and FG-MACT MMMM SC V.1, VII.7, and IX.1. The deviation report states testing required in FG-MACT MMMM SC V.1 was conducted 1 month, 6 days late, the RTO VOC DE did not meet the minimum VOC DE required in FG-COATINGLINEA SC IV.1, and the stack test plan required in FG-MACT MMMM SC VII.7 was received 30 days late (30 days prior to the originally scheduled test date of January 29, 2021). According to the deviation report, a cracked seam in the RTO chamber caused the VOC DE to be reduced to approximately 80%. The report states the crack was repaired in accordance with the SSM plan within 24 hours of the crack being detected. The test report for the VOC DE testing conducted on the RTO for FG-COATINGLINEA on February 26, 2021 states the VOC DE was 98% during testing which is greater than the minimum VOC DE of 95% required in FG-COATINGLINEA SC IV.1.
05/03/2022	MAERS	Compliance	MAERS Certification Form received.
05/03/2022	MAERS	Compliance	MAERS Report Submission. Report passed audit.
09/11/2020	ROP Semi 1 Cert	Compliance	

Name:

K. Kelly

Date:

08/25/2022

Supervisor:

Joyce