

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

N727573775

FACILITY: PIRANHA HOSE PRODUCTS		SRN / ID: N7275
LOCATION: 2500 WEIGEL ST., CADILLAC		DISTRICT: Cadillac
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT: Chris Beydoun , General Manager		ACTIVITY DATE: 09/04/2024
STAFF: Lindsey Wells	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: FY24 FCE; a VN will be issued for Rule 201 and failure to maintain acceptable records		
RESOLVED COMPLAINTS:		

Introduction

On 9/4/2024 AQD District staff Lindsey Wells mobilized to Piranha Hose Products (SRN: N7275) located at 2500 Weigel Street in Cadillac (Wexford County, postal zipcode 49601) to conduct an unscheduled, unannounced compliance inspection.

The purpose of the on-site inspection was to determine compliance with the Michigan Air Pollution Control rules and permit to install (PTI) 186-03.

Summary

Based on observations during the 9/4/24 inspection and 9/19/24 records review meeting, the facility is not compliant with 186-03 due to the installation of unpermitted equipment and failure to maintain records in a format by which compliance with permitted emission limits can be evaluated.

Facility Information

Piranha hose manufactures high pressure hoses for various industries such as sewer cleaning, paint spray, hydraulics, and oil and gas industry products. Activities at the facility include extrusion of resins into inner and outer hose cores, braiding of hose cores for structural reinforcement, and final assembly such as the addition of fittings.

A review of the permit file indicates the use of adhesives is the primary emission generating activity, with volatile organic compounds being the pollutant of interest. The application also details exemptions claimed by the facility for de minimis solvent usage, the pyrolysis oven, and extruders 2 and 4 which do not utilize adhesive and are dedicate to inner core production. The application of paint to fittings occurs by hand and is eligible for exemption.

On-Site Inspection Notes

Upon arrival to site, no visible emissions or odors were observed. Staff were referred to Dean Rohn, the vice president of the facility. Staff explained the purpose of the visit was a compliance inspection and proceeded on a process walkthrough. All parts of the process appeared to be operating during the inspection. After the walkthrough, staff met with Christina Beydoun, Denise Nethaway, and Mike Mullins to review the available usage records and discuss the permit. All available records were readily provided to staff upon request.

Compliance Evaluation PTI 186-03

Permitted equipment in 186-03 includes:

- (7) single braiders with adhesive application
- (5) double deck braiders with adhesive application
- (5) horizontal deck braiders with adhesive application
- (3) extruders noted as outer core extruders 1, 3, and 5 with adhesive application.

This equipment is organized into a flexible group FG-ADHESIVES subject to the following:

VOC emissions are limited to 12.5 tons per year and methylene chloride emissions are limited to 5.2 tpy and 1.7 pounds per month.

Compliance is demonstrated via monthly adhesive use records and VOC mass balance based on adhesive components. At the time of the inspection, the facility tracks total adhesive usage. However, due to the installation of unpermitted equipment, staff are unable to evaluate if the permitted equipment is in compliance with the emission limits noted above.

A violation notice will be sent for failure to keep records in a format acceptable to the AQD district supervisor, and for the installation of additional equipment without a permit to install. The facility reports to have installed (2) additional extruders and many additional braiders that utilize adhesive.

Based on observations at the time of the September 4 site inspection records review meeting, the facility is not compliant with the conditions of PTI 186-03.

NAME Lindsey Wells

DATE 11-26-24

SUPERVISOR Shane Nixon