

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

P081563546

FACILITY: Summit Polymers Plant 18		SRN / ID: P0815
LOCATION: 5858 E. North Avenue, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Nick Oberski , Manufacturing Engineer		ACTIVITY DATE: 07/07/2022
STAFF: Monica Brothers	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced scheduled inspection		
RESOLVED COMPLAINTS:		

This was an unannounced, scheduled inspection. Summit Polymers-Plant 18 is a facility that makes plastic parts for the automotive industry by using plastic injection molding machines. They make many of these parts for Chevy, Ford, and Nissan. They have one primer booth and two top-coat booths under EUCOATING and a single coating booth under EUCOATING2. They commenced operations in February 2018, and they are currently operating under PTI #64-17A. They currently have 249 employees at this location, who work three shifts per day, five days per week, with possible overtime on weekends.

Staff, Monica Brothers, arrived onsite at about 8:30am and met with Lucy Dominguez, the Manufacturing Paint Supervisor. I did not observe any visible emissions upon arrival. Nick Oberski, Manufacturing Engineer, was not at the facility that day, but is the current contact person for environmental audits at that plant location. Lucy said that all of the recordkeeping is done by Amanda Crux, who does not work at this particular Summit Polymers location. She said that she would give me her contact information so that she could send me the required recordkeeping documents after the tour of the facility that day.

Facility Tour:

This facility has about 29 injection molding machines, along with some welding equipment, which are considered exempt from permitting. They do not have any boilers. They have only three very small portable generators and one electric fire pump. They have one Safety-Kleen parts washer, and during the tour, the rules were posted, and the lid was closed.

They currently have one plastic parts coating line (EUCOATING), which has a natural gas fired flame treating process for the plastic parts, one primer booth that has two robotic applicators, a flash-off area for the primer booth, two top-coat booths that each have their own flash-off area, followed by an electric IR oven. Each booth has dry filters as a control device. They use both solvent-based and water-based coatings on the coating line. I observed that all coating containers were closed at the time of inspection. I looked at the filters on each of the booths, and they appeared to be installed properly. Lucy said that they change out the blanket filters at least once every shift, the inlet filters monthly, and the exhaust bag filters once a week. They have a temperature limit of 194°F for their IR cure oven. Lucy said that there is an alarm on the oven that would shut down the oven before going over 194°F and showed me the computer display for all of the oven sections and their respective temperatures. Section 1 had a temperature reading of 196°F, Section 2 had a temperature reading of 180°F, and Section 3 had a temperature reading of 179°F. I later asked Amanda Crux in a follow-up email about why the Section 1 temperature was above the 194°F limit in their permit. She said that they have a temperature range set from 187 to 194, but that they had been troubleshooting issues with a couple malfunctioning heater zones

earlier that month. She said that it is possible the working zones were trying to over correct for the malfunctioning one(s) that day during my tour of the facility. A Violation Notice will be sent for this cure oven temperature limit exceedance.

PTI#64-17A also contains EUCOATING2 for a single coating booth, flash zone, and infrared oven that was permitted in 2019. However, when I toured the facility, the painting robot had been removed and much of the booth was dismantled. When I asked Amanda about this in a follow-up email, she said that the robot was removed on 7/7/2022 and sent to another facility that had an immediate need. She said that they have decided to permanently remove that emission unit from the facility and will begin the process of modifying their PTI to reflect the change.

Recordkeeping:

After the facility tour, I emailed Amanda Crux and let her know all of the recordkeeping items I needed to see. Amanda said that when they tried retrieving the oven temperature data, they discovered that their units were faulty and that they could not retrieve any data. She said that it also appears that the historical data was lost. The facility had similar cure oven temperature recordkeeping issues the last time the facility was inspected in 2018. A Violation Notice will be sent for this. I reviewed the other records carefully and the following table outlines the recordkeeping requirements for PTI #64-17A, along with my comments on the associated records that the company submitted to me. The facility has some recordkeeping violations as well as a material usage exceedance for Group 4 Coatings and a cure oven temperature exceedance. A violation notice will be sent.

EUCOATING (entire coating line):

Condition	Limit	Comments
<p>VI.1 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.</p>	<p>N/A</p>	<p>Compliance</p>
<p>VI.2 The permittee shall monitor and record the cure oven temperature for EUCOATING on a continuous basis.</p>	<p>194°F</p>	<p>Non-compliance: Facility did not have records to show compliance with this temperature limit. This limit was also exceeded in Section 1 of the EUCOATING cure oven at the time of inspection.</p>

<p>VI.3 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.4 (a) Gallons (minus water) of each VOC containing material used and, if applicable, reclaimed on a daily basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.4 (b) VOC (minus water) content of each material as applied on a daily basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.4(c) VOC emission calculations determining the volume-weighted average VOC content of the coatings in pounds per gallon, minus water, as applied on a daily basis.</p>	<p>5.0 lbs/gal</p>	<p>Compliance: The facility is keeping these records and is not currently using any material with a VOC content above 5 lbs/gal.</p>
<p>VI.6 (a) Gallons (with water) of each ethylbenzene (CAS No. 100-41-4), methyl isobutyl ketone (CAS No. 108-10-1), glycol ether DB (CAS No. 112-34-5), and PCBT (CAS No. 98-56-6) containing material used</p>	<p>N/A</p>	<p>Compliance: Facility is keeping these records.</p>

<p>and, if applicable, reclaimed, on a monthly basis.</p>		
<p>VI.6(b) The ethylbenzene, methyl isobutyl ketone, glycol ether DB, and PCBT contents (with water) in pounds per gallon of each material used, on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: Facility is keeping these records.</p>
<p>VI.6(c) Ethylbenzene, methyl isobutyl ketone, glycol ether DB, and PCBT mass emission calculations determining the monthly emission rate in tons per calendar month, each separately.</p>	<p>N/A</p>	<p>Compliance: Facility is keeping these records.</p>
<p>VI.6(d) Ethylbenzene, methyl isobutyl ketone, glycol ether DB, and PCBT mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month, each separately.</p>	<p>Ethylbenzene: 1.2 tpy Methyl Isobutyl ketone: 3.9 tpy Glycol ether DB: 3.0 tpy PCBT: 108.0 tpy</p>	<p>Non-compliance: The facility is keeping monthly and calendar year records. However, they seem to only have one 12-month-rolling calculation per year, and do not have one for each calendar month. They need to add an additional recordkeeping section that shows a continuous 12-month rolling calculation for each month. Based on their current records, it is apparent that they are under these permitted limits. A Violation Notice will be sent for just the 12-month rolling recordkeeping requirement.</p>
<p>VI.7 The permittee shall keep, in a satisfactory manner, continuous records of the cure oven temperature for EU COATING as required by SC VI.2. Continuous temperature data recording shall consist of</p>		<p>Non-compliance: The facility is not keeping these records.</p>

<p>instantaneous measurements made at equally spaced intervals, not to exceed 15 minutes per interval.</p>		
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EUCOATING: Each Primer and Top-coat Booth separately and total combined:

Condition	Limit	Comments
<p>VI.5(a) Gallons (with water) of each VOC, TBA (CAS No. 540-88-5), acetone (CAS No. 67-64-1), and PCBT (CAS No. 98-56-6) containing material used and, if applicable, reclaimed on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.5(b) VOC (with water), TBA, acetone, and PCBT contents of each material as applied on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.5(c) VOC, TBA, acetone, and PCBT mass emission calculations determining the monthly emission rate in tons per calendar month, each separately and combined.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.5(d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.</p>	<p>88.5 TPY</p>	<p>Non-compliance: The facility is keeping monthly and calendar year records. However, they seem to only have one 12-month-rolling calculation per year, and do not have one for each calendar month. They need to add an additional recordkeeping section that shows a continuous 12-month rolling calculation for each month. Based on their current records, it is apparent that</p>

		they are under this permitted limit. A Violation Notice will be sent for just the 12-month rolling recordkeeping requirement.
VI.5(e) Combined VOC, TBA, acetone, and PCBT mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.	Primer Spray Booth: 114.0 TPY Topcoat Spray Booths (two total), each separately: 57.0 TPY	Non-compliance: The facility is keeping monthly and calendar year records. However, they seem to only have one 12-month-rolling calculation per year, and do not have one for each calendar month. They need to add an additional recordkeeping section that shows a continuous 12-month rolling calculation for each month. Based on their current records, it is apparent that they are under these permitted limits. A Violation Notice will be sent for just the 12-month rolling recordkeeping requirement.

EUCOATING2:

Condition	Limit	Comments
VI.1 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	N/A	Compliance: The facility is keeping these records.
VI.2 The permittee shall maintain a current listing from	N/A	Compliance: The facility is keeping these records.

<p>the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.</p>		
<p>VI.3(a) Gallons (with water) of each VOC, TBA (CAS No. 540-88-5), acetone (CAS No. 67-64-1), and PCBT (CAS No. 98-56-6) containing material used and, if applicable, reclaimed on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.3(b) VOC (with water), TBA, acetone, and PCBT contents of each material as applied on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.3(c) VOC, TBA, acetone, and PCBT mass emission calculations determining the monthly emission rate in tons per calendar month, each separately and combined.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.3(d) Combined VOC, TBA, acetone, and PCBT mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.</p>	<p>50.0 TPY (12-month rolling)</p>	<p>Non-compliance: The facility is keeping monthly and calendar year records. However, they seem to only have one 12-month-rolling calculation per year, and do not have one for each calendar month. They need to add an additional recordkeeping section that shows a continuous 12-month</p>

		rolling calculation for each month. Based on their current records, it is apparent that they are under this permitted limit. A Violation Notice will be sent for just the 12-month rolling recordkeeping requirement.
VI.4(a) Gallons (minus water) of each VOC containing material used and, if applicable, reclaimed on a daily basis	N/A	Compliance: The facility is keeping these records.
VI.4(b) VOC (minus water) content of each material as applied on a daily basis.	N/A	Compliance: The facility is keeping these records.
VI.4(c) VOC emission calculations determining the volume-weighted average VOC content of the coatings in pounds per gallon, minus water, as applied on a daily basis.	5.0 lbs/gal	Compliance: The facility is keeping these records and is not currently using any material with a VOC content above 5 lb/gal.
VI.5 The permittee shall monitor and keep, in a satisfactory manner, continuous records of the cure oven temperature for EUCOATING2. Continuous temperature data recording shall consist of instantaneous measurements made at equally spaced intervals, not to exceed 15 minutes per interval		Non-compliance: The facility is not keeping these records.

FGFACILITY:

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Condition	Limit	Comments
<p>VI.1 The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 30th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.2 The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer’s formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.3(a) Gallons or pounds of each HAP containing material used, on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.3(b) Where applicable, gallons or pounds of each HAP containing material reclaimed, on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.3(c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used, on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>

<p>VI.3(d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.3(e) Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.</p>	<p>Aggregate HAPS: 22.4 TPY Individual HAPS: 8.9 TPY</p>	<p>Non-compliance: The facility is keeping monthly and calendar year records. However, they seem to only have one 12-month-rolling calculation per year, and do not have one for each calendar month. They need to add an additional recordkeeping section that shows a continuous 12-month rolling calculation for each month. Based on their current records, it is apparent that they are under these permitted limits. A Violation Notice will be sent for just the 12-month rolling recordkeeping requirement.</p>
<p>VI.4(a) Gallons or pounds of each VOC containing material used and, if applicable, reclaimed, on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.4(b) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used, on a monthly basis.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.4(c) Gallons, with water, of each of the following coatings groups used per 12-month rolling time period as determined at the end of each calendar month, each separately: Group 1 Coatings, Group 2 Coatings, Group 3</p>	<p>Group 1: 12,145 gallons Group 2: 8,316 gallons Group 3: 24,251 gallons Group 4: 5,661 gallons Group 5: 6,683 gallons</p>	<p>Non-compliance: The facility is keeping monthly and calendar year records. However, they seem to only have one 12-month-rolling calculation per year, and do not have one for each calendar month. They need to add an additional</p>

<p>Coatings, Group 4 Coatings, and Group 5 coatings</p>		<p>recordkeeping section that shows a continuous 12-month rolling calculation for each month. According to their records for 2022, it appears that they have exceeded the Group 4 limit of 5,661 gallons per 12-month rolling time period. A violation notice will be sent for these items.</p>
<p>VI.4(d) VOC emission calculations determining the monthly emission rate in tons per calendar month.</p>	<p>N/A</p>	<p>Compliance: The facility is keeping these records.</p>
<p>VI.4(e) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.</p>	<p>89.9 TPY</p>	<p>Non-compliance: The facility is keeping monthly and calendar year records. However, they seem to only have one 12-month-rolling calculation per year, and do not have one for each calendar month. They need to add an additional recordkeeping section that shows a continuous 12-month rolling calculation for each month. Based on their current records, it is apparent that they are under this permitted limit. A Violation Notice will be sent for just the 12-month rolling recordkeeping requirement.</p>

NAME Monica Brothers

DATE 9/14/22

SUPERVISOR RIL 9/15/22