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Genesee

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

U25180228045470

FACILITY: Aristeo Installation LLC		SRN / ID: P0972
LOCATION: 11341 West Vienna Road, MONTROSE		DISTRICT: Lansing
CITY: MONTROSE		COUNTY: GENESEE
CONTACT: Craig Bishop , Operations Manager		ACTIVITY DATE: 08/02/2018
STAFF: Daniel McGeen	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: Minor
SUBJECT: Unannounced, scheduled inspection, and odor evaluation.		
RESOLVED COMPLAINTS: C-18-02327		

On 8/2/2018, the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Aristeo Installation LLC (Aristeo).

**Facility environmental contacts:**

Craig Bishop, Operations Manager; 734-762-7451; [cbishop@aristeo.com](mailto:cbishop@aristeo.com)

Matthew Galsterer, Purchasing Admin./Business Development, 734-762-7457, [mgalsterer@aristeo.com](mailto:mgalsterer@aristeo.com)

**Facility description:**

This facility is in the business of metal fabrication. They cut and weld metal to assemble their products, and then prime and paint them in coating booths onsite.

**Emission units:**

3 coating lines (4 Paint Areas) with 4 filter systems, 4 exhaust fans and 4 exhaust stacks: noncompliance with Rule 201; permit application since submitted to AQD

Welding process(es), Rule 285(2)(i): compliance

Metal machining processes, Rule 285(2)(l)(vi)(B): compliance

**Regulatory overview:**

This facility is considered a *minor source of criteria pollutants*, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exist. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A *major source* of criteria pollutants has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants, and would be subject to the Renewable Operating Permit program.

This facility is also considered to be a minor or *area source* for hazardous air Pollutants (HAPs), because it has a PTE of less than 10 TPY for any single HAP and less than 25 TPY for all HAPs combined.

There does not appear to be a boiler onsite. It is typical for industrial facilities to have hot water heaters onsite for restrooms, however. To meet the definition of a hot water heater under 40 CFR Part 63, Subpart JJJJJJ, *National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional boilers Area Sources*, the unit must be no more than 120 gallons in capacity. A hot water heater <120 gallons in size would not be subject, under Section 63.11195(f). A facility with the number of employees Aristeo has would generally not be expected to have a hot water heater that would be larger than this.

It is unknown if Aristeo is subject to 40 CFR Part 63, Subpart XXXXXX, *National Emissions Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Nine Metal Fabricating and Finishing*

**Source Categories.** By e-mail, AQD will provide the company with links to compliance assistance tools on the AQD webpage for the Metal Fabrication and Finishing Area Source NESHAP. This federal rule applies only to sources which are primarily in one of 9 source categories. These 9 source categories are identified with 15 North American Industrial Classification System (NAICS) Codes, so the company can determine their applicability based on their facility's NAICS Code.

**Fee status:**

This facility is not considered a Category I fee-subject facility, because it is not a major source of criteria air pollutants. It is not considered a category II fee-subject source because it is neither a major source for hazardous air pollutants, nor is it subject to a federal New Source Performance Standard regulation. Lastly, it is not considered a Category III fee-subject facility, because it is not subject to a federal Maximum Achievable Control Technology standard.

**Location:**

The facility is located along M-57 (Vienna Road) a short distance west of downtown Montrose. The nearest residence is to the north, directly across the street.

**History:**

It is AQD 's understanding that Aristeo purchased this facility in late 2014, and that coating operations began here in early 2015. AQD has been advised that the coatings have always been the same coatings which they started with, and have not been changed over time.

There has been a series of complaints alleged against Aristeo in 2018, with the primary complainant residing about 4,000 feet upwind. The complainant reported experiencing odors and physical symptoms of illness when walking or otherwise traveling by Aristeo. They contacted AQD starting in April in 2018, and alleged emissions from Aristeo were causing these health effects. They also alleged that Aristeo must have changed their operations in March 2018, when the complaint described first getting sick. They have also alleged that Aristeo may be doing things which AQD does not know about, releasing chemicals into the air which were not used prior to March. AQD conducted today's inspection, to respond to this last allegation.

Complaint investigations by AQD found only one instance of noncompliance; that the facility at certain times in the last year or two may have exceeded the 200 gallons per month exemption threshold for a coating line allowed by Rule 287. A Violation Notice (VN) for not having a permit to install as required by Michigan Air Pollution Control Rule 201 was sent to the company on 7/10/2018. The company was informed that an acceptable program for compliance could include an air permit application.

The company expressed a willingness to submit an air permit application, to obtain a permit to install for their coating lines. I recommended originally that they apply for a General PTI for coating operations, since their VOC emissions would probably fall below 10 TPY VOC for a single line and below 30 TPY VOC for all lines combined.

However, it turns out that their exhaust stacks for their coating booths were slightly under the 1.5 times the building height. To be eligible for the general PTI, one of the criteria is that exhaust stacks be at least 1.5 times the height of the building.. Therefore, the company began working on a site-specific permit application, and has recently submitted their application to the AQD for review. AQD Permits Section will review the application, and make a determination on whether to approve the PTI or not. If the permit application is not approvable, the company may correct any deficiencies, and resubmit the application.

**Safety apparel required:**

Site safety requirements are not known to me, but I would recommend safety glasses with side shields and steel-toed work boots.

**Odor evaluation:**

I checked for odors as I drove west through the town of Montrose, on M-57, also known as Vienna Road. Weather conditions were cloudy and 75 degrees F, with winds out of the west southwest at 10-15 miles per hour. I detected no odors as I drove past the Aristeo site at 12:26 PM.

Unbeknownst to me, a complaint letter from the primary complainant was on its way to the Lansing District Office, to arrive the following day (8/3/2018). Today, I stopped at the residence of the complainant at 12:27 PM, after the odor evaluation. The complainant verbally relayed much of the same information to me as was in the forthcoming letter. This included suspicion on their part that Aristeo uses a timer to turn on exhaust fans at 5:20 AM to vent emissions from the paint booths left over from the previous day or night. They informed me that since they have detected odors and feel health effects in the morning, before the plant is known to be operating, that their theory would account for the odors they detected. I indicated that I had no knowledge of Aristeo turning on exhaust fans prior to the start of daily operations.

The complainant told me that they tried to go out for a walk at 5:30 AM today, but they detected the odors which they attribute to Aristeo, and started throwing up. I inquired as to the wind direction, and they advised me that there was a slight to no breeze. He then described starting to go for a walk, heading westward at 6:18 AM. He said that as soon as the sun came up, "it activated the chemicals," which he believed have been deposited over the surrounding countryside, and he turned back. I do not have a means of proving or disproving the complainant's belief.

While I was at the residence of the complainant, I also returned to them five samples of suspected fallout which turned out to not meet AQD's criteria for valid samples. They were samples in five Petri dishes, and the AQD Lansing District had given them to the complainant on 6/21/2018, to set out overnight. I had picked them up on 7/12/2018, with what the complainant believed to be industrial fallout in them. However, AQD's Quality Assurance Coordinator, Ms. Amy Robinson, and AQD's previous lab coordinator, Ms. Susan Kilmer later advised me that these samples did not meet three key criteria to be valid.

1. The samples did not have a proper chain of custody. This was because the samples were not within AQD's sight at all times.
2. The samples could be considered a bio-hazard. The complainant had told me that they were vomiting from air pollution odors immediately prior to collecting the samples, and their saliva had ended up in some of the Petri dishes. I was advised by AQD staff that the samples were not valid, because of the bio-hazard of bodily fluids.
3. The samples contained materials other than the fallout. Because a small number of grass clippings had ended up in the samples, I was advised that they were determined to be invalid, because of containing materials other than the suspected fallout.

I advised the primary complainant of the above information. I indicated that he was welcome to keep the samples, in the event that he should decide to submit them to a private laboratory in the future. I also indicated we would try to collect fallout samples in the future, and we would take steps to ensure that the three criteria above would be met.

I left for Aristeo at this time. I did not detect any paint odors at the residence of the complainant.

**Arrival:**

I arrived onsite at Aristeo at 12:52 PM, and it appeared that office staff were out for lunch. I returned at 1:32 PM, and asked to meet with Mr. Craig Bishop, Operations Manager. I indicated I would like to walk through the entire plant, as one recent allegation was speculation that Aristeo may be doing industrial operations that AQD does not know about.

Mr. Bishop was very willing to show me both the north and south plant buildings. I informed Mr. Bishop of the complainant's allegation that they exhaust their paint booths prior to plant startup each day., and inquired if anything like that happens. He advised me that they do not vent their coating booths prior

to the start of operations nor do they have exhaust fans on timers. He advised me that they do not have paint or primer droplets escaping the plant, because of their filtration systems. Additionally, he advised me that if there were to be fallout of any of their coatings, it would likely land on employee vehicles in their parking lot, and generate a quick response from their employees.

#### Inspection:

Mr. Bishop, per my request, took me through the north building and the south building at the Aristeo site.

The only part of the north building I did not examine appeared to be a locker room or restroom, and an office. The manufacturing area in the north plant contained a large, open area for metal fabrication, which had a hydraulic machine for working with metal. I was informed that it is electrically powered; there is no fossil fuel combustion. I also observed their large (2,500 square foot) paint booth which could be subdivided into two smaller paint booths, Paint Area 1 and Paint Area 2. Please see attached photos of the filter systems for these two paint areas. The filters appeared to be maintained in proper condition.

The south building had a large, open area for metal fabrication, and two paint booths, labeled Paint Area 3 and Paint Area 4. Please see attached photos. The filtration systems for both booths appeared as if they were being maintained properly.

Some of the complaints made against Aristeo allege that clear droplets have landed on the complainant's eyeglasses or auto windshield when they have gone by. I could not find any evidence of clear coatings in use. Clear coatings are commonly used in the automotive industry, but I have to date not yet witnessed them in use by any metal fabricators.

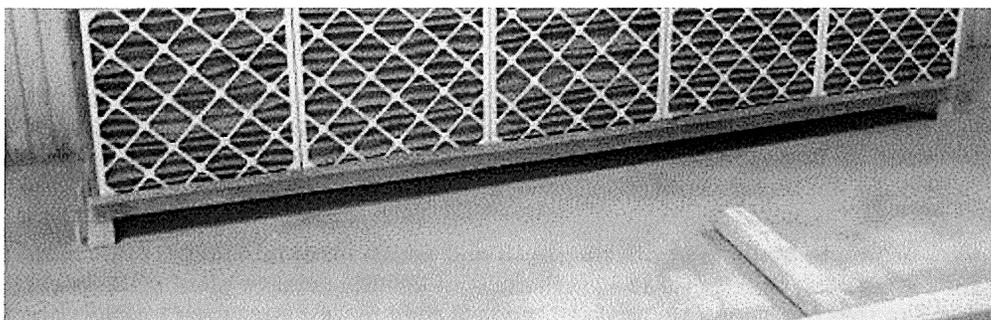
I did not observe any opacity from any of the exhaust stacks for Paint Areas 1 through 4. There was no sign of fallout of particulate from coatings.

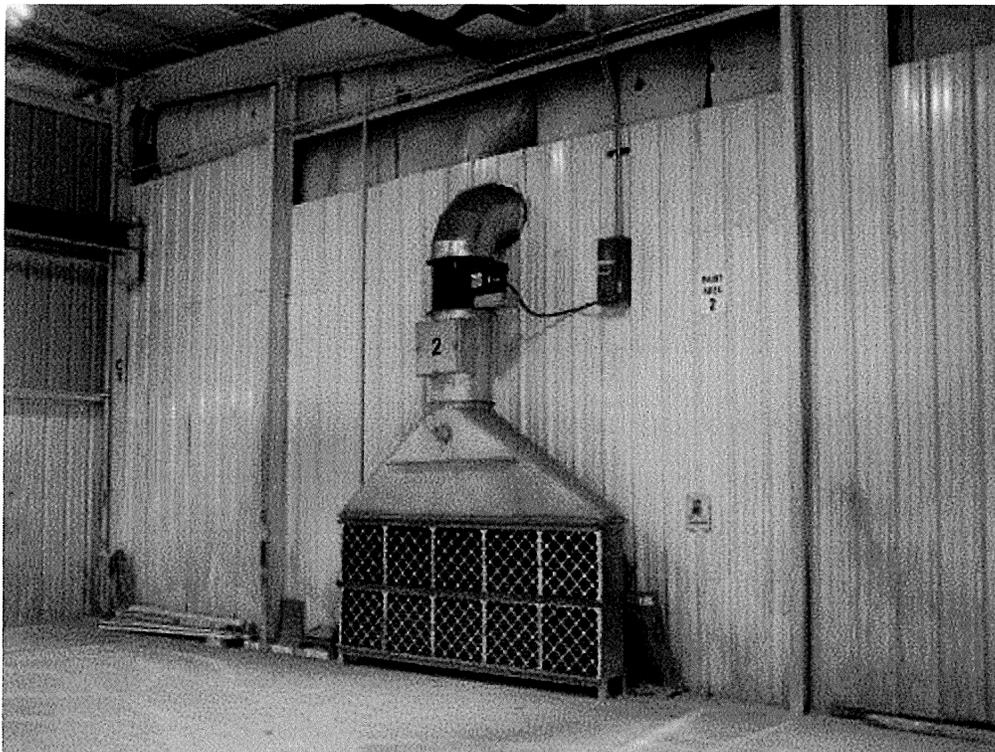
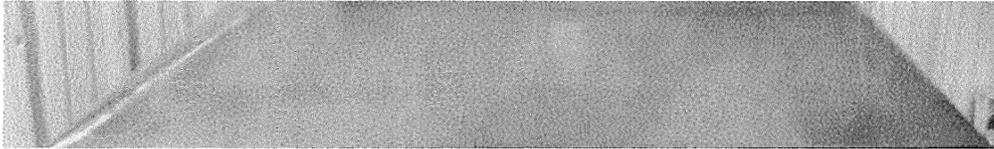
I could not find any evidence of industrial processes which AQD had previously been unaware of.

#### Conclusion:

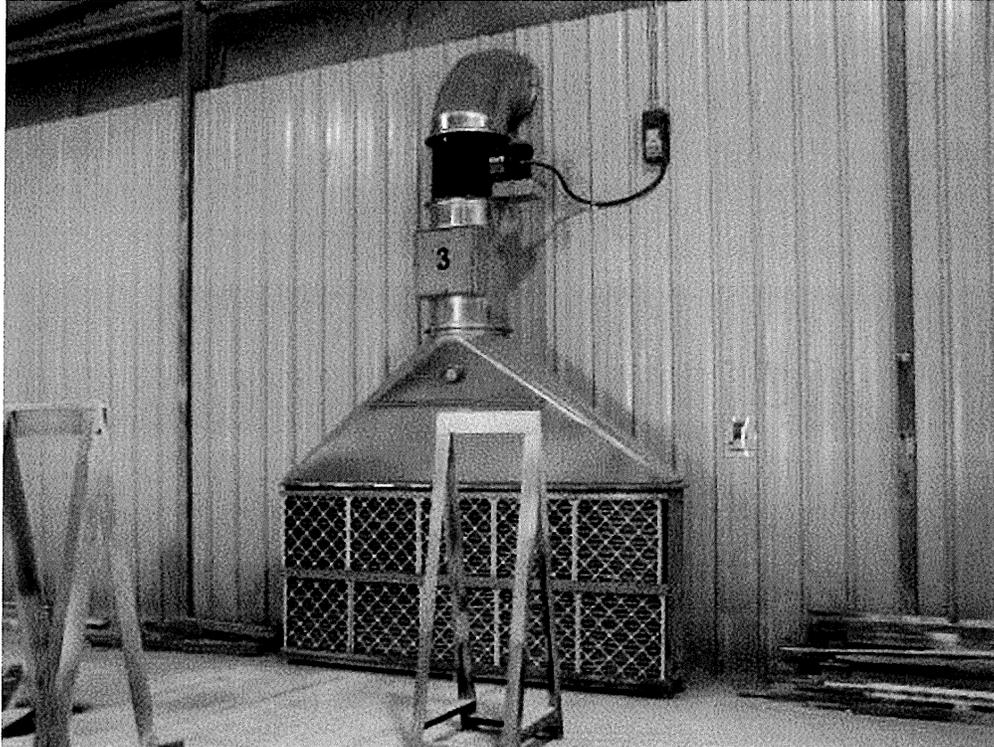
No new instances of noncompliance were found. The only instance of noncompliance AQD has identified with this facility is the failure to meet the exemption criteria of Rule 287 for their coating lines. The facility has submitted a permit to install application to AQD, and that application will go through the New Source Review (NSR) process. The AQD Permit Section will make a determination on if that permit can be issued.

I could not find any evidence today to substantiate the allegation that Aristeo may have industrial processes which are unknown to AQD.

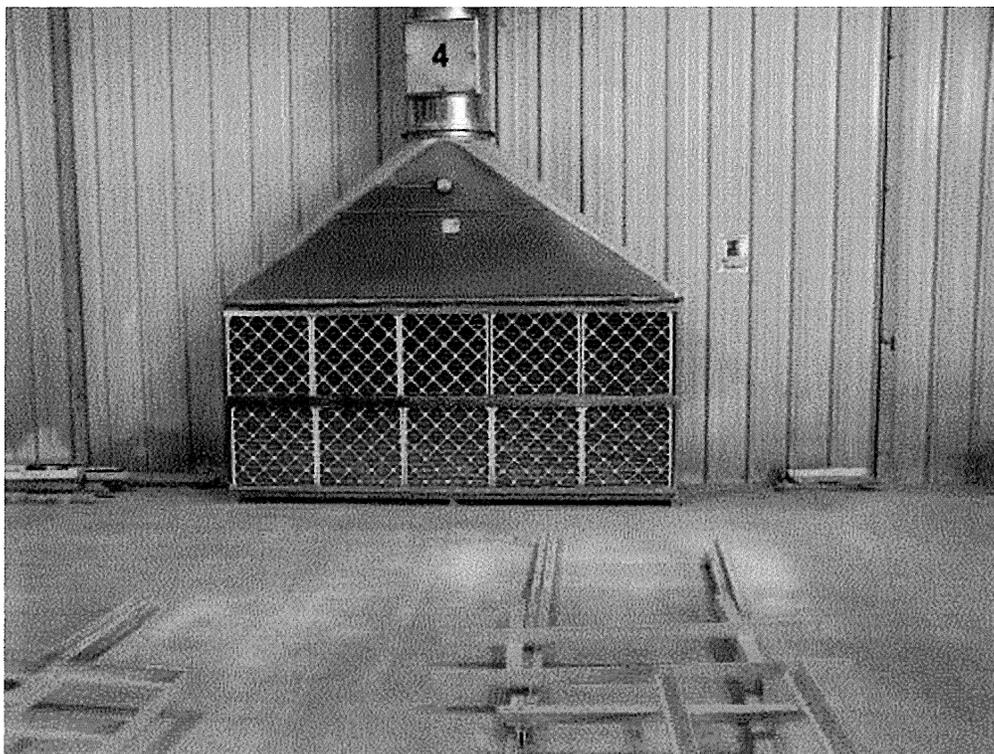




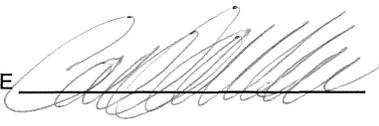
**Image 2(002)** : Paint Area 2 filter system.



**Image 3(003)** : Paint Area 3 filter system.



**Image 4(004)** : Paint Area 4 filter system.

NAME 

DATE 10/17/2018

SUPERVISOR 