

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

P098373908

FACILITY: FALCON RME, LLC		SRN / ID: P0983
LOCATION: 2600 W SALZBURG ROAD, AUBURN		DISTRICT: Bay City
CITY: AUBURN		COUNTY: BAY
CONTACT: Korey Lester , President and CEO		ACTIVITY DATE: 09/03/2024
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Facility inspection		
RESOLVED COMPLAINTS:		

On September 3, 2024, Ben Witkopp of the Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division (AQD) conducted an inspection of Falcon. The company began operation in 2004. It was originally located on Waldo Rd in Midland Michigan and moved to a couple of locations before building a new facility at the NW corner of Salzburg and Flajole Rds in Bay County. The facility was issued air use permit 203-18 on December 18, 2018.

I had previously spoken with Company founder Mr. Mike Groulx about bringing some new AQD staff. I asked that some insight about the business side be provided along with access to key company members. Haley Willman and Erin Sheridan were the new AQD staff allowed to participate by AQD Supervisor Gina McCann. Company staff included Mr. Korey Lester - President and CEO, Justin Dyjak - Controller, and Charles Varnes handling Health, Safety, and Environment.

Mike was pleased to offer information about the company history, product development as time passed, trials and tribulations along the way, safety and health considerations both during product engineering for the end user as well as Falcon employees, the actual production process etc. Mike and company staff also provided insight on what is involved in day to day operations of the business and their thoughts for the future. Questions and answers were free flowing among all attendees.

We then went out and got a tour of the facility operations. Company staff responsible for the various production units were made available for instruction and answering questions along the way.

The company makes the small sized equipment used to help repair holes in asphalt pavement. Municipalities are its primary customers. Falcon is the largest company in its industry group. The company does not use prefabricated metal parts. It receives steel in various sizes and shapes. It then fabricates parts through cutting, drilling, and welding. The fumes from the metal fabrication area are routed outside into a baghouse and the air returned inside. AQD rule 285 (I) (vi) (B) fits the situation at Falcon as an exemption to AQD permitting requirements. Each unit is hand assembled as required. Falcon does fulfill custom orders to accommodate the customer's needs. The company staff thoroughly showed and explained the unique features of their products.

Prior to being painted, the units are placed into a blast booth. The blasting operation uses glass as the blasting media. The door to the booth is closed. The worker performs the blasting while wearing protective coveralls and a fresh air supplied hood. The booth exhaust is routed to a cartridge style collector. Installation of a drop

box (55 gallon barrel) prior to the vertical ascent of ductwork to dust collector allows gravity to drop sharps, heavies, and glass from the airstream. The drop box thereby preserves the filters in the collector. The air is routed back into the facility and there is another set of filters prior to doing so. Therefore, the system is deemed to be internally exhausted.

The blasting serves a twofold purpose. The primary function is to create a tiny bit of roughness on the surface, so the coatings have improved adhesion. It also provides some cleaning of the metal. No prewash or spray cleaning is conducted. Since the permit is a general coatings line permit, the blasting area is not covered. Additionally, due to the use of glass as the blasting media it may technically not be able to be exempt from permitting based only upon a first glance of the exemption. AQD rule 285 (I) (vi) does not specifically list glass in the list of blasting material. However, if one realizes that glass is nothing more than liquid sand (sand which is heated to a molten state and allowed to cool) the exemptions found under rule 285 (I) (vi) (B) readily fits based on the material used.

The actual coating occurs in two production lines. The lines run east to west, and each is comprised of a prime booth, a drying area, and then a topcoat booth. Ovens are not used to dry or cure the painted products. Two separate paint kitchens are used. High volume low pressure (HVLP) spray guns are used to apply the coatings. The booth numbering system is a bit confusing. Line 1 is the primary coating line but has booths 2 and 4. It is the northerly line. Line 2 is comprised of booths 1 and 3 and it located to the south of Line 1. The guns are placed in small holders that allows the guns to be cleaned when not in use or between color changes. This helps to cut down on solvent usage. The primer is a urethane while the topcoat is an epoxy. Booth filters were in place though no painting was occurring at the time. Solvent is reclaimed and reused internally.

After the coating is completed, the units can proceed to any one of several racks. The racks can raise the units to facilitate final assembly of lights, controls etc. This final step used by Falcon enables the employees to have better access to each unit thereby making their work easier.

Company staff then showed AQD some of its prototype truck mounted equipment being designed for two different large municipalities. Truck mounted equipment is a new venture for the company. Final questions and answers were addressed.

We then went back into the office area. AQD permitting was discussed in general and then specifically Falcons permit. The permit limits each coating line to 2,000 pounds of volatile organic compounds (VOC) per month and 10 tpy based on a 12-month rolling time period. The entire source has an overall VOC limit of 30 tpy. Charles loaded the spreadsheet and it was subsequently viewed on a large screen. Justin explained the gathering / handling of the material information, usage data etc. and the resulting emissions.

The records had emissions for each individual line but the 12-month rolling aspect was missing. We discussed the situation and it was used as a teaching moment for all. Technically the lack of records on a 12-month rolling basis was a violation. However, it was not worthy of a violation notice given that the highest VOC emission rate for either line was under 1,000 pounds. That meant the limit of 10 tons per booth and the 30 tons for the facility were being met. Since the data was present,

it would be a relatively simple task to generate the 12- month rolling information. Justin said he would make the additions and provide an updated spreadsheet by the end of the day.

The records were provided as Justin promised. The records were shared with Haley and Erin so they could see the final spreadsheet. The highest individual month for Line 1 was 964 pounds of VOC while Line 2's highest was 952 pounds. The 12-month rolling VOC amounts per booth were 4.71 tons for Line 1 and 4.01 tons for Line 2. The highest facility total VOC emission amount was 8.39 tons on a 12-month rolling time period. It should be noted the records are including amounts of solvent that are internally reclaimed and reused. Therefore, the records of VOC emissions are on the high side.

## CONCLUSION

Based upon the operations seen and the records reviewed, the facility is considered to be in compliance with its air permit.

NAME B. Lott

DATE 9-30-24 SUPERVISOR Yvonne R. W. Cam