

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

P125071676

FACILITY: NATIONAL COMPOSITES-AMERICAN RECREATIONAL PRODUCTS		SRN / ID: P1250
LOCATION: 130 S ALLOY DRIVE, FENTON		DISTRICT: Lansing
CITY: FENTON		COUNTY: GENESEE
CONTACT: John Mason , EHS Director		ACTIVITY DATE: 03/29/2024
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Attempted inspection of a facility which had not begun construction. This Partial Compliance Evaluation activity was conducted as part of a Full Compliance Evaluation.		
RESOLVED COMPLAINTS:		

On March 29, 2024, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) attempted to conduct an unannounced inspection of National Composites - American Recreational Products, LLC (National Composites). The company had received Permit to Install (PTI) 150-22 on November 29, 2022, but had not begun installation or construction at the site. This attempted inspection was a Partial Compliance Evaluation activity, conducted as part of a Full Compliance Evaluation.

Facility Environmental Contact:

John E. Mason, Jr., Environmental, Health & Safety Director; 248-257-0323;
jmason@nationalcomposites.com

EGLE, AQD contact:

Dan McGeen, inspector; 517-648-7547; McGeenD@michigan.gov

Facility description:

This facility was permitted to manufacture boats and fiberglass reinforced plastic (FRP) composite products, using an open lamination process and a resin transfer molding (RTM) process. Additional operations would include use of adhesives; polyurethane foam production; finishing operations using mold releases, mold cleaning compounds and repair compounds; and cleanup activities using solvents.

Emission units*

- EUOPENMOLDING: Not installed.
- EUGELCOAT: Not installed.
- EURTM: Not installed.
- EUFOAM: Not installed.
- EUADHESIVE: Not installed.
- EUFINISH: Not installed.
- EUCLEANUP: Not installed.

*An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.

Flexible groups:**

- FGMACTVVVV: EUOPENMOLDING, EUGELCOAT, EURTM, EUADHESIVE, EUFINISH, EUCLEANUP.
- FGMACTWWWW: EUOPENMOLDING, EUGELCOAT, EURTM, EUADHESIVE, EUFINISH, EUCLEANUP.

****A flexible group is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.**

Regulatory review:

The proposed boat and FRP composite product manufacturing facility has a potential to emit (PTE) below the major source threshold of 250 tons per year (TPY) for each criteria pollutant and would not be considered a major source subject to Prevention of Significant Deterioration (PSD) Regulations in Part 18 of the Michigan Air Pollution Control (MAPC) Rules nor the Nonattainment New Source Review (NNSR) Regulations in Part 19 of the MAPC Rules.

However, the proposed facility would become a major source under Title 40 of the Code of Federal Regulations (CFR), Part 70 for its PTE of hazardous air pollutants (HAPs), primarily styrene. The major threshold for HAPs is 10 tons per year (TPY) of any individual HAP or 25 TPY of total combined HAPs. Under State and Federal rules, a potential new major HAP source requires public notice.

Because this facility would be a major HAPS source, there was a public comment period which began 10/5/ 2022 and ended 11/21/2022. A public hearing was requested via email on 10/6/2022, and an informational session immediately followed by a virtual public hearing took place on 11/7/2022. No written comments, voicemail comments or email comments were received during the Public Comment Period. During the 11/7 informational session and virtual public hearing there were no questions or comments made. On 11/29/2022, the decision maker Chris Ethridge approved the proposed permit.

Fee category:

This facility would be a Category C fee source, because it would be major for HAPs.

Location:

- Address: 130 S. Alloy Drive, Fenton, MI 48430, Genesee County
- Description: The planned site for the facility is on the western edge of an industrial park. Commercial businesses are located to the west, with industries to the east, south, and north.

Attempted inspection:

On March 29, 2024, the AQD inspector D. McGeen attempted to conduct an unannounced inspection of National Composites. Driving by the site at 9:44 AM, he observed that it was still a vacant lot, with no signs of construction or installation having commenced.

Follow up activities:

- 6/3/2024: The facility environmental contact, John Mason, submitted a PTI extension request, but that was 5 days after the 18 month-window for installation had expired.
- 6/20/2024: The AQD drove by the site of the facility again and confirmed that there had been no installation or construction following the 3/29 attempted inspection.
- 7/18/2024, it was determined that PTI 150-22 would not be extended, due to the extension request being 5 days late, and the facility now being subject to newer MAPC Part 6 Rules, specifically Rule 637. The AQD's D. McGeen called J. Mason to inform him.

- On 9/17/2020, D. McGeen emailed a request to the AQD Permits Section to void PTI 150-22. The void is pending, as of the date of this inspection report.

Conclusion:

No instances of noncompliance were identified. However, no installation had taken place within 18 months since PTI 159-95B was issued, and the permit is considered void. The permit void request submitted by the AQD Lansing District Office is pending.

NAME DATE 9/23/2024SUPERVISOR 