

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

B202555401

FACILITY: Aquatic Co		SRN / ID: B2025
LOCATION: 888 W BROADWAY RD, THREE RIVERS		DISTRICT: Kalamazoo
CITY: THREE RIVERS		COUNTY: SAINT JOSEPH
CONTACT: Joe Hutson , Plant Superintendent		ACTIVITY DATE: 09/01/2020
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	
SUBJECT: Scheduled Inspection for FCE.		SOURCE CLASS: MAJOR
RESOLVED COMPLAINTS:		

On September 1, 2020, AQD staff traveled to St. Joseph County to perform an inspection of Aquatic Company to determine the facility's compliance with MI-ROP-B2025-2020 and applicable state and federal air pollution control regulations 40 CFR Part 63 Subpart WWWW.

AQD staff arrived on site at 1:15 to cloudy conditions with a temperature of 74°F, and a SW wind of 8 mph. There were no noticeable odors or visible emission upon arrival.

AQD staff met with Joe Hutson (Plant Manager) and Tricia Huff (HR/HSC) who answered all questions and escorted staff around the facility. The facility manufactures various fiberglass showers and tubs.

The following discusses the results of the on-site inspection and review of records:

#### FGMACT WWWW

The existing open molding source engaged in the production of reinforced plastic composites as identified in 40 CFR Part 63, Subpart WWWW 63.5785(a), and using the compliance option in 63.5810(c). Also includes cleaning, mixing, HAP containing materials storage, and repair operations associated with the production of plastic composites. The facility uses a rotary concentrator, and RTO, and permanent total enclosure as necessary to comply with the MACT 12-month rolling weighted average emission limit.

Emission Units: EUFIRST-LAM, EUSECOND-LAM, EUTHIRD-LAM, EUGEL-COAT, EUROLL-OUT, EUMOLDREPAIR, EUPRODUCTREPAIR, EURISINTANKS, EUMIXERS.

Pollution Control Equipment: Rotary concentrator and RTO

The facility is required to demonstrate that they meet the weighted average of the organic HAP emission limits. Records were reviewed on-site which indicated the facility is in compliance each month. A start-up/shut-down and malfunction plan was provided and reviewed.

The facility is required to keep records of resin and gelcoat use, organic HAP content, and operation where resin is used. These records are being kept in an acceptable manner.

The facility is keeping monthly charts on RTO combustion chamber, desorber supply temperature, and desorber pressure drop. At the time of inspection, the RTO was operating at 1660°F. The desorption temperatures were reading at 360°F, and 356°F. These temperatures meet the conditions of the ROP.

All Semiannual/Annual reports were received in a timely manner and are reviewed upon receipt.

#### FGFRPFABRICATION

Fiberglass reinforced plastic spray-up operation. This includes gelcoat and fiberglass/resin steps performed on an assembly line basis.

Emission Units: EUGEL-COAT, EUFIRST-LAM, EUSECOND-LAM, EUTHIRD-LAM, EUROLL-OUT, EUSOLVENT-USAGE

Pollution control equipment: Roll media (fiberglass tack filters), rotary concentrator and RTO.

All exhaust filters were in place and operating properly at the time of inspection.

All waste resins, gelcoats, catalysts and acetone were stored in closed containers at the time of inspection.

The facility is required to keep a record of the dates and times that FGFRPFABRICATION operates without taking credit for the add-on control device. These records are being kept and were acceptable.

The facility is required to maintain records of the following:

1. Pounds of each gelcoat and lamination resin used each calendar month and 12-month rolling time period.
2. As supplied styrene, VOC and vapor suppressant content of each gelcoat and lamination resin.
3. Styrene and VOC mass emission calculations determining monthly emission rates in tons per month.
4. Styrene and VOC mass emission calculations determining the yearly emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
5. Emission calculations for cleanup and purge solvents (acetone).

These records are being maintained in acceptable formats.

The facility is required to maintain a current listing from the manufacturer of the chemical composition of each material used. A listing is being kept and was acceptable.

The facility is required to perform visual inspections of each of the primary particulate exhaust filters at each booth on a daily basis. These inspections are being logged and the record of these logs are maintained in a satisfactory manner.

All Semiannual/Annual reports were received in a timely manner and are reviewed upon receipt.


FG-RULE 287 (c)

Emission Units: EUPAINT, EUPRODUCTREPAIR

According to Mr. Hutson, EUPAINT has not been used for several years.

EUPRODUCTREPAIR has a material limit of 200 gallons per month, as applied, minus water, per emission unit. The most recent calendar month shows zero gallons of paint used. This is due to EUPRODUCTREPAIR being rarely used.

The facility is required to maintain records of filter replacements for exhaust systems serving coating spray equipment. This record is being kept and was acceptable.

NAME 

DATE 9/25/2020

SUPERVISOR RIL 10/5/20