

M4852

MAWILK

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

M485235427

FACILITY: CREST INDUSTRIES		SRN / ID: M4852
LOCATION: 1337 KING, TRENTON		DISTRICT: Detroit
CITY: TRENTON		COUNTY: WAYNE
CONTACT: Norm Wheeler ,		ACTIVITY DATE: 04/14/2016
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Syn Minor Opt Out
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : April 14, 2016  
 TIME OF INSPECTION : 10:15 am  
 NAICS CODE : 325520  
 EPA POLLUTANT CLASS : VOC  
 INSPECTED BY : Jill Zimmerman  
 PERSONNEL PRESENT : Michelle Jesue  
 FACILITY PHONE NUMBER : 734-479-4141

### FACILITY BACKGROUND

Crest batch blends various chemicals to produce automotive sealants, adhesives and caulks. Crest supplies products to automotive dealerships, body shops and other industrial accounts. The facility operates one shift per day, five days per week.

Crest originally operated in Wyandotte, and moved to this location in 2000. All equipment was relocated to the Trenton location, and the facility was issued permit 188-00 to cover all equipment located at the Trenton location.

### REQUIRED PPE

Steel toed shoes and safety glasses were worn during the onsite inspection. No other safety equipment was required during the onsite inspection.

### COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility. No violations have been issued to this facility.

### PROCESS EQUIPMENT AND CONTROLS

All chemicals are mixed in vessels as part of a batch process. All mixing takes place in the mixing room and all vessels vent directly to the general room air.

### INSPECTION NARRATIVE

I arrived at the facility at 10:15 am. Upon entering the facility I met with Ms. Michelle Jesue. Ms. Jesue explained that Norm Wheeler, chemist, and Mike Schlaff, Operations Manager, were both out of the building during my inspection. Ms. Jesue walked me through the facility. The front of the building is office space. The majority of the building is warehouse space. There is also storage space for raw materials. The mixing room, where products are blended in a batch process to form automotive sealants, adhesives, and caulks is located in the southeast corner of the building.

During the onsite inspection, no batch blending was being performed. I spoke with the individual who operators the mixer. He explained that all of the mixers listed in the permit are still located at the facility. The facility primarily uses EUMIXER1 and EUMIXER2, with each

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mixer producing about one batch every two months. EUMIXER3 was used for black products. However these types of products are almost completely discontinued, so this mixer is rarely used. EUWATER is used to make a batch about once every six months, and mixes a soap liquid used in car washes. EUSILICONE is used to make a batch about once a year, making a product that is packaged in one pint containers. EUMIXER4 and EUMIXER 5 are non-dedicated mixers attached to 250 gallon covered totes or 55 gallon covered drums. The mixer explained that Crest still sells the products, but a lot of products are made offsite by a third party, so actual product at the Trenton location is down significantly.

### **APPLICABLE RULES/PERMIT CONDITIONS**

Crest Industries is currently operating under PTI 188-00, which was issued on December 20, 2001. This permit covers seven mixers of varying sizes, and a repacking and relabeling operations. All of the mixers are permitted under flexible group FGMIXERS. There is also a flexible group which covered the entire process, FGPROCESS. The special conditions are as follows:

#### **EUPACK**

1.1 Compliance – VOC emissions from EUPACK do not exceed 0.1 tons / year. I based this determination because EUPACK only operated in January 2016 and February 2016 with a maximum throughput of 8,425 pounds in January 2016. This amount is less than one fifth of the permitted limit.

1.2 Compliance – The facility used less than 8500 pounds of material in January 2016 and less than 5900 pounds of material in February 2016. This is less than the permitted limit of 48,000 pounds of material per month.

#### **FGMIXERS**

2.1 Compliance – The VOC limit for this emission unit is 4.6 tpy, based on a 12-month rolling average. Between January 2016 and March 2016, the facility emitted about 0.62 tons of VOCs, which is under the limit.

2.2a Compliance – The permitted limit for all material throughput is 56,700 pounds per calendar month. Based on the received records, the highest month throughput was 6,989 pounds during the month of March 2016, which is less than the permitted limit.

2.2b Compliance – The permitted limit for total organic liquids throughput is 22,400 pounds per calendar month. Based on the received records, the highest month throughput was 1,235 pounds during the month of January 2016, which is less than the permitted limit.

2.2c Compliance – The permitted limit for total weight toluene throughput is 1,200 pounds per calendar day. Based on the received records, the highest day throughput was 37 pounds during the month of January 2016, which is less than the permitted limit.

2.2d Compliance – The permitted limit for hexsoly throughput is 650 pounds per calendar day. Based on the received records, No hexsoly has been used.

2.2e Compliance – The permitted limit for isopropyl alcohol throughput is 650 pounds per calendar day. Based on the received records, No isopropyl alcohol has been used.

2.3 Undetermined – During the onsite inspection, the mixers were not being used.

2.4 Undetermined – During the onsite inspection, the employee responsible for the recordkeeping was unavailable. During the next onsite inspection, the area of the interface between the mixer and the shaft will be verified. The records that were received lacked an identifying year and units. The records were assumed to be for 2016 and the units were assumed to be pounds.

**FGPROCESS**

3.1 Compliance – The monthly highest amount of material processed in FGMIXERS was 6989 pounds in March. This value is about 10 % of the maximum allowable amount to be processed in a month. Therefore the particulate emissions from FGMIXERS were less than 0.26 tons / year.

3.2 Compliance – The facility is limited to processing less than 32,300 pounds of solid material per calendar month. The facility processed less than 3,500 pounds of material during January 2016 which was the highest reported monthly value.

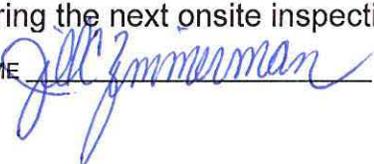
3.3 Undetermined – The facility maintains process records for each batch of material. A copy of these records for the time period between January 2016 and March 2016 is attached to this report. A request for additional records was unanswered. Additional records will be reviewed during the next onsite inspection.

**MAERS REPORT REVIEW**

The permit sites Rule 205 (3) in the special conditions. Therefore, this is a synthetic minor source. The facility has been added to the MAERS program, and will begin reporting emissions for 2016.

**FINAL COMPLIANCE DETERMINATION**

Crest Industries appears to be operating in compliance with all state and federal regulations as well as all of the evaluated permit conditions. Additional review of some records will occur during the next onsite inspection.

NAME  DATE 9/20/16 SUPERVISOR 