

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

N193563983

FACILITY: SUMMIT POLYMERS, INC - SYNTECH PLANT		SRN / ID: N1935
LOCATION: 1211 PROGRESS ST, STURGIS		DISTRICT: Kalamazoo
CITY: STURGIS		COUNTY: SAINT JOSEPH
CONTACT: Justin Wabindato , General Manager		ACTIVITY DATE: 07/14/2022
STAFF: Chance Collins	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection for FCE		
RESOLVED COMPLAINTS:		

On July 14, 2022 AQD staff traveled to St. Joseph County to perform an inspection of Summit Polymers, Inc – Syntech Plant. The purpose of the inspection was to determine the facility's compliance with Permit to Install No. 160-16, General Permit 37-07, and applicable state and federal air pollution control regulations.

AQD staff arrived on site at 10:40 a.m. to overcast conditions with a temperature of 73°F with a W wind of 0 mph. There were no noticeable odors upon arrival.

AQD staff met with Justin Wabindato (General Manager), Dylon Moore (Paint Department Manager) and Dan Mulkey (Engineer) who walked staff around the facility and answered all questions.

The following discusses the findings of the inspection and review of records:

Permit to Install No. 160-16:

EU-BOOTH3AND4

A miscellaneous plastic parts coating line consisting of two robotic spray booths, two flash-off areas, and an enclosed infrared (IR) cure oven. The plastic parts travel through the unit in the following order: Coating Booth 3, Flash-Off Area 3, Coating Booth 4, Flash-Off Area 4, IR Cure Oven. Coating may be applied in Coating Booth 3 only, Coating Booth 4 only, or in both booths simultaneously.

Pollution control equipment: Dry filters on spray booths.

The following pollutants are tracked by 12-month rolling time period determined at the end of each calendar month:

Pollutant	Equipment	Limit	Actual	Compliance
VOC, Acetone (CAS No. 67-64-1), and tert-Butyl Acetate (CAS No. 540-88-5) combined	Coating Booth 3 portion of EU-BOOTH3AND4	58.0 Tons per year (TPY)	16.2 TPY	Appears to be i compliance
VOC, Acetone (CAS No. 67-64-1), and tert-Butyl Acetate (CAS No. 540-88-5) combined	Coating Booth 4 portion of EU-BOOTH3AND4	58.0 TPY	16.2 TPY	Appears to be i compliance

Glycol Ether DB (CAS No. 112-34-5)	EU-BOOTH3AND4	2,697 lb/year	81 lb/year	Appears to be in compliance
Dimethyl Glutarate (CAS No. 1119-40-0)	EU-BOOTH3AND4	2,803 lb/year	283 lb/year	Appears to be in compliance

The following pollutants are tracked by calendar day and weighted average.

Pollutant	Equipment	Limit	Compliance
P-chlorobenzotrifluoride (CAS No. 98-56-6)	EU-BOOTH3AND4	107.7 lb/day	Appears to be in compliance
Cyclohexanone (CAS No. 108-94-1)	EU-BOOTH3AND4	195.2 lb/day	Appears to be in compliance
VOCs	EU-BOOTH3AND4	5.0 lb/gal (minus water) as applied	Appears to be in compliance

At the time of inspection, spray booths 3 and 4 (EU-BOOTH3AND4) were in operation. All waste material was stored in closed containers. Filters were installed and appeared to be maintained and operated in a satisfactory manner. The booths were operated with HVLP applicators. IR cure oven temperature was reading at 185° F which is within permit limit of 194°F.

All required records are being kept in a satisfactory manner and were reviewed on site.

FGFACILITY

All process equipment source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.

Pollution control equipment are dry filters on the spray booths.

All required records are being kept in a satisfactory manner and were reviewed on site.

The following pollutants are tracked on a 12-month rolling time period as determined at the end of each calendar month:

Pollutant	Limit	Compliance
Each Individual HAP	Less than 8.9 tpy	Appears to be in compliance

Aggregate HAPs	Less than 22.4 tpy	Appears to be in compliance
-----------------------	---------------------------	------------------------------------

Pollutant	Limit	Actual	Compliance
VOCs	Less than 89.9 tpy	12.3 tpy	Appears to be in compliance
Methyl Isobutyl Ketone (CAS No 108-10-1)	15,768 lb/year	175 lb/year	Appears to be in compliance
Cumene (CAS No. 98-82-8)	2,803 lb/year	175 lb/year	Appears to be in compliance

Material	Maximum VOC Content, As applied, in pounds per gallon	Annual Usage Limit	Actual	Compliance
Group 1 Coatings	0.0 – 3.0	32,800 gallons (with water) per year	10,342 gal	Appears to be in compliance
Group 2 Coatings	3.01 – 5.8	13,200 gallons (with water) per year	2,783 gal	Appears to be in compliance

General Permit to Install 37-07

FG-COATING: One or more coating lines and all associated purge and clean-up operations, where each coating line is a single series in a coating process and is comprised of one or more coating applicators, any associated flash-off areas, drying areas, and ovens where one or more surface coatings are applied and subsequently dried or cured.

The coating line associated with General Permit 37-07 is rarely used at the facility. The VOC limit is 2,000 lb/month. The 12-month rolling time period as determined at the end of each calendar month usage at the time of inspection was 1.5 gallons of material. This is well below the permit limit of 2,000 lb/month.

NAME  _____

DATE 8/11/22

SUPERVISOR RIL 8/12/22