

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

N203962285

FACILITY: GRUPO ANTOLIN		SRN / ID: N2039
LOCATION: 6300 EUCLID, MARLETTE		DISTRICT: Bay City
CITY: MARLETTE		COUNTY: SANILAC
CONTACT: Scott Forbes , Project Engineer / EH&S Coordinator		ACTIVITY DATE: 01/20/2022
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On-site inspection.		
RESOLVED COMPLAINTS:		

An onsite inspection and records review was conducted by Air Quality Division (AQD) staff Adam Shaffer (AS) of the Grupo Antolin (GA) site located in Marlette, MI. Applicable records were requested on January 18, 2022, to verify compliance with permit to install (PTI) No. 255-03A. An in-person inspection to verify onsite compliance was later completed on January 20, 2022.

Facility Description

The GA facility is a headliner manufacturer for several automotive companies and the site is in operation with PTI No. 255-03A. The facility has taken opt out permit limits for hazardous air pollutants (HAPs).

Offsite Compliance Review

Based on the timing of the inspection, the 2020 Michigan Air Emissions Reporting System (MAERS) Report was submitted on March 2, 2021, and later reviewed. The 2020 MAERS appeared acceptable and the 2021 MAERS was discussed with company staff prior to submittal.

Compliance Evaluation

A request was sent to Mr. Scott Forbes, Project Engineer / Environmental, Health & Safety Coordinator, of GA on January 18, 2022. Electronic copies of the records were submitted to AS by the company during the inspection and will be discussed further in this report. The onsite inspection was completed on January 20, 2022. AQD staff AS arrived in the area at 9:49am. Weather conditions at the time were mostly cloudy skies, temperatures in the middle teen's degrees Fahrenheit, and winds from the northwest at 5-10mph. While offsite, no odors that would appear to be coming from the site were noted. No emissions were observed while offsite. Upon arriving onsite, AS met with Mr. Forbes, who provided a tour of the facility and answered site specific questions. Requested records were provided by Mr. Forbes electronically during the inspection.

As mentioned above, GA is a headliner manufacturing facility for several automotive companies. The various states of onsite processes were observed during the inspection.

PTI No. 255-03A

FGPROCESSES

This flexible group is for automotive headliner manufacturing processes including foam production, adhesive mixing, thermoforming of prefabricated substrates and robotic gasket application. Emissions for this flexible group are EUFOAM, EUGLASUTEC, EUPET, and EUEQUIPCLEAN. During the course of the inspection, it was discussed and concluded that

the EUEQUIPCLEAN (one electric oven used for cleaning the process equipment) is no longer onsite.

During the course of the inspection, the processes for EUFOAM, EUGLASUTEC, and EUPET were observed.

Per Special Condition (SC) VI.1, the permittee shall keep records of the quantity and type of materials used in FGPROCESSES on a monthly / 12-month rolling time period basis. Records were requested and reviewed for select time periods. Several follow up conversations were completed with company staff and their respective consultant explaining the records and how they are in compliance with PTI No. 255-03A. When the spreadsheet was first created (records started in 2018), the facility used equations from industry guidelines to back calculate from total parts created to show emissions. The calculations appear to be based on a ratio of materials used to create each part, however, errors were noted and the calculations need to be updated to accurately reflect current emissions. The facility doesn't keep a separate tab of usages but had mentioned moving forward on having a tab showing usages for easier readability / demonstrating compliance. After further review, the records appear acceptable for this condition at this time, however, moving forward the records shall be updated accordingly and presented in a way for better readability and interpretation of compliance.

Per SC VI.2, the permittee shall keep records of the number of headliners produced in FGPROCESSES on a monthly / 12-month rolling time period basis. Records were requested and reviewed for select time periods. Based on the records reviewed, this condition appears to be being met.

Per SC VI.3, the permittee shall keep records of calculations identifying the quality, nature and quantity of emissions from FGPROCESSES on a monthly / 12-month rolling time period basis. Records were requested and reviewed for select time periods. As mentioned above, several conversations were held with company staff and their respective consultant in order to clarify records provided. Errors were noted in the records, however, after further review it appeared that the company is overestimating emissions. It was noted during the review that the company had started using a new material (SikeMelt-677) in October 2017, that contained a HAP (CAS # 80-62-6) that was not in the HAP emission records. The PTI No. 255-03A had been approved following the started use of the SikeMelt-677 material, however, this was not included in the permit revision. Documents were requested and provided to verify the additional material didn't require a permit revision. After further review the documents demonstrating that a permit revision was not needed appear acceptable at this time. It was concluded that the emission records overall are acceptable at this time, however, moving forward the records will be corrected to better demonstrate GA is meeting the requirements for this condition.

FGADHESIVE

This flexible group is for two adhesive spray booths. Emission units for this flexible group consist of EUADHESIVE1 and EUADHESIVE2. At the time of the inspection, EUADHESIVE2 was not in operation and based on a discussion with company staff appeared to not have been turned on during 2021. Based on this unit not in operation, onsite observations to verify compliance with PTI No. 255-03A were specifically for only EUADHESIVE1.

This flexible group is subject to a VOCs and Acetone (CAS # 67-64-1) emission limit of 14.0 tons per year (tpy) per a 12-month rolling time period. Records were requested and reviewed for select time periods. Based on the records reviewed, no acetone emissions are reported emitted in the time periods reviewed. For the month of December 2021, 0.0078 tons of VOC emissions were reported emitted. As of December 2021, 0.0952 tpy of VOCs were reported emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed also appeared to be within the permitted limit.

Per SC III.1, the permittee shall capture all waste coatings and shall store them in closed containers. The permittee shall dispose of all waste coatings in an acceptable manner in compliance with all applicable state and federal regulations. Containers observed around EUADHESIVE1 booth were sealed at the time of the inspection and waste is disposed of by Safety Kleen.

Per SC III.2, the permittee shall handle all VOC and / or HAP containing materials, including coatings and solvents, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. Based on the observations made at the time of the inspection, this appeared to be being completed.

Per SC IV.1, the permittee shall not operate EUADHESIVE1 unless the exhaust filters are installed, maintained and operated in a satisfactory manner. At the time of the inspection, the filters appeared acceptable. Filters are changed approximately once a week. A magnehelic gauge is installed for the exhaust system and read 0.04 inch of water column at the time of the inspection. Speaking with staff it was stated that once the magnehelic gauge reading reaches 0.5 inch of water column the filters are changed.

Per SC IV.2, the permittee shall equip and maintain FGADHESIVE with air-atomized applicators or comparable technology with equivalent transfer efficiency. Based on the observations made at the time of the inspection, this appears to be being completed.

Per SC V.1, the permittee shall determine the VOC content of all coatings using EPA Test Method 24, or manufacturer's formulation data upon written approval by the AQD District Supervisor. Speaking with company staff during the site inspection, it appears that safety data sheets (SDS) are used to determine the VOC contents. Records were requested and provided for select SDS and upon further review, GA appears to be using the worst-case VOC contents for materials. Moving forward, GA shall either use EPA Test Method 24 or submit a request and utilize manufacturer's formulation data to determine the VOC contents of applicable materials.

Per SC VI.2 the permittee shall maintain a listing of the chemical composition of each material used, including the weight percent of each component. Based on the records provided, this condition appears to be being met.

Per SC VI.3, the permittee shall maintain records of the usage rates of each material used, the VOC / acetone contents, and the VOC / acetone monthly / 12-month rolling time period emissions. Records were requested and reviewed for select time periods. As mentioned above several conversations were held with company staff and their respective consultant to discuss the records provided. Errors were noted in the records; however, the records were concluded too overall be acceptable. Moving forward the company shall correct and update the records for easier readability in verifying compliance.

Two stacks were listed in association with this permit and were observed during the course of the site inspection. Though the stacks were not measured, based on the observations made / comments made by company staff, the stacks appear acceptable per PTI No. 255-03A.

FGFACILITY

This flexible group is for all process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.

This flexible group is subject to an individual / aggregate HAP emission limits of less than 9.0 tpy / less than 22.5 tpy per a 12-month rolling time period respectively. Records were requested and reviewed for select time periods. Based on the records provided, it appeared that the only HAP emitted was MDI (CAS # 101-68-8), however, one SDS reviewed showed the HAP methyl methacrylate (CAS # 80-62-6). Regarding the MDI emissions that were provided, for the month of December 2021, 1.09 lbs of MDI emissions were emitted. As of December 2021, 15.7923 lbs of MDI emissions were reported emitted which is well within the permitted limit for both individual / aggregate HAPs. Previous 12-month rolling time periods reviewed also appeared to be well within the permitted limits. Regarding the additional HAP emissions identified, based on the information provided by the company of monthly usages and a review of a copy of the SDS, it is highly unlikely that the additional HAP emissions would cause an individual / aggregate HAPs emission limit exceedance. Moving forward, the company shall keep track of the additional HAP emissions.

Per SC V.1, the permittee shall determine the HAP content of any adhesive as received and as applied, using manufacturers formulation data. Speaking with company staff it was determined that GA uses SDS instead of formulation data, however, the company does use worse case contents for materials used. It was explained to company staff during the inspection the difference between formulation data and SDS. Moving forward GA shall use manufacturers formulation data to determine the HAP contents of adhesive materials used.

Per SC VI.1, the permittee shall keep, in a satisfactory manner, monthly / 12-month rolling time period records of calculations of the individual HAPs and combined HAP emissions for FGFACILITY. Records were requested and reviewed for select time periods. Several conversations were held between AS and the company staff with their consultant on understanding the records. As mentioned above, errors were noted and improvements were discussed at length with the company. Initially, it had appeared that the only HAP emitted was MDI (CAS # 101-68-8), however, a second HAP (CAS # 80-62-6) was later noted in a material used. After further review, it was concluded that overall, the records appeared acceptable at this time. However, moving forward, the errors identified shall be corrected.

Additional Observations

One 500 kW Generac emergency generator that uses diesel was observed during the course of the site inspection. Based on a February 12, 2018, maintenance record provided, the engine appeared to have a recordable hour's meter that read 72.9 hours of operation. The generator was not hooked up at the time of the inspection, and if turned on would potentially be moved to a different location onsite. Company staff were aware that the generator would potentially need a permit if turned on.

A maintenance area was observed during the course of the inspection. Equipment observed in the maintenance area appeared to be exempt per Rule 285(2)(l)(vi)(B).

Prior to the inspection, company staff had mentioned being in operation with a general permit to install along with PTI No. 255-03A. A review of the AQD permit database before the site inspection identified no general permit to install. This was stated to company staff during the inspection.

It was clarified to company staff that emission units that are included in a permit do not also need an applicable exemption.

Conclusion

Based on the facility walkthrough, observations made, and records received, GA appears to be in compliance with PTI No. 255-03A and applicable air quality rules.

NAME Adam Shaffer

DATE 03/28/2022

SUPERVISOR Chris Hare