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

N238332469

FACILITY: DGP INC.		**SRN / ID:** N2383
LOCATION: 3260 FENNER ST., MARLETTE		**DISTRICT:** Saginaw Bay
CITY: MARLETTE		**COUNTY:** SANILAC
CONTACT: Chris Clark Jr. , Vice President		**ACTIVITY DATE:** 12/09/2015
STAFF: Sydney Bruestle	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: On site inspection and record review to determine compliance with Permit number: MI-ROP-N2383-2013.		
RESOLVED COMPLAINTS:		

I (slb) performed a scheduled inspection at DGP Inc. located at 3260 Fenner St., Marlette MI 48453. The purpose of this site inspection was to determine compliance with the facility's Renewable Operating Permit (MI-ROP-N2383-2013) and air quality regulations.

Facility Description:DGP manufactures fiberglass parts for vehicles such as buses, trucks, RV's and Race cars. They also produce prototypes and custom molds. The manufacturing process consists of a pattern shop (EU-PATTERNSHOP), production area (EU-LAMINATION and EU-GELCOAT) and clean up activities (EU-CLEANUP). Usual process flow is as follows: Gel coat, Lamination booth (at west end), trim, cure, finish in finishing area. The facility currently employs 25 people.

Regulatory Description: DGP Inc. is a major source for Hazardous Air Pollutants (HAPs). The facility has a potential to emit (PTE) of greater than 10 tons per year (TPY) for individual HAPs and greater than 25 TPY for combined HAPs. The Facility emits Styrene and Methyl Methacrylate (MMA), commonly used in fiber glass products.

Compliance Determination: I met with Chris Clark Jr., owner and responsible official. Mr. Clark brought me through the manufacturing areas and presented me with records the facility is required to maintain per the ROP.

Emission Unit: EU-PATTERNSHOP

Description: Process may be done in an open area of the facility or in

one of the two spray booths used in EU-LAMINATION materials in this EU may include Bondo, catalyst, tooling gelcoat (air atomized, done in gelcoat spray booth), mold resin (hand layup) for making patterns.Records were reviewed and are attached to the report.

12 month rolling time period calculations are based on a time period from October 2014- November 2015. Recorded values are listed as actual in the table below.

	Emission Limits		Material Limits		Monitoring/ Record Keeping
	Styrene	*6.0 tpy* ***Actual:***	*Tooling Gelcoat*	*Calendar Day: 216 lbs* ***Actual: 30 lbs/day (at most)*** *12 month rolling time period: 9, 996 lbs* ***Actual: 590 lbs*** *Maximum Styrene*	*The permittee shall keep the following information for each calendar month for EU-PATTERNSHOP: a. The identity and amount (in pounds) of each material used on a daily and monthly basis b.The styrene content of each*

EU-PATTERNSHOP		***0.94 TPY***		*Content: 38 % wt* ***Actual: 36.91%*** *Maximum MMA content: 5 % wt* ***Actual: 3%***	*material used c.The MMA content of each material used d.The acetone content of the tooling gelcoat used. e.The VOC content of each material used f.The VOC and MEK content of the catalyst used.*
	VOC (including Styrene)	*278 lb/day* ***Actual: 1 lb/day***	*Mold Resin*	*Calendar Day: 2,170 lbs Actual: 971 lbs (at most) 12 month rolling time period: 103, 956 lbs* ***Actual: 4,973 lbs*** *Maximum Styrene Content: 50 % wt Actual:* ***47.2%***	*The appropriate emission factor for each raw material used (specify the application method and applicable monomer contents*
	VOC (including styrene)	*6.2 tpy* ***Actual: 0.25 TPY***	*Bondo body filler*	*Calendar Day: 1,080 lbs* ***Actual: 100 lbs/day (at most)*** *12 month rolling time period: 18,000 lbs* ***Actual: 1,891 lbs*** *Maximum Styrene Content: 22 % wt* ***Actual: 22%***	*Calculations determining the total daily, monthly and annual usage rates for each material, as applicable, to demonstrate compliance with SC 1.3 a through d. The annual usage rates shall be calculated based upon a 12-month rolling time period basis as determined at the end of each calendar month*
				Calendar Day: 44 lbs ***Actual: 2 lbs/day***	*Styrene emission calculations determining the monthly emission rate in tons per calendar month,*

				max *12 month rolling time period: 2,279 lbs* ***Actual: 112 lbs***	*and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month*
	Acetone	*500 lb/year* ***Actual: 476 lbs/yr***	*Catalyst*		
					VOC emission calculations determining the daily emission rate in pounds per calendar day
					VOC emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each

					calendar month
					Acetone emission calculations determining the monthly emission rate in pounds per calendar month, and the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month
					The records shall be kept in the formats specified in Appendix 4, or in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request
Records Checked	Yes	Yes	Yes	Yes	Yes
Compliance Status	Compliance	Compliance	Compliance	Compliance	Compliance

Emission Unit: EU-LAMINATION

Description: Two dry filter spray booths utilized mostly for lamination processes. Materials used may include polyester resin and/or gelcoat, PVA, Lacquer thinner, patch booster, catalyst, and lacquer primer. Records were reviewed and are attached to the report.

12 month rolling time period calculations are based on a time period from October 2014- November 2015. Recorded values are listed as actual in the table below.

	Emission Limits		**Material Limits**		**Monitoring/Record keeping**
				Calendar Day: 2,688 lbs Actual: 0 lbs (They have the ability to	

EU-LAMINATION	Styrene	19.8 tpy Actual: 0.92 TPY	Gelcoat	spray gel coat here but currently do not) 12 month rolling time period: 59, 040 lbs Actual: 0 lbs Maximum Styrene Content: 38 % wt Actual: 36.91 % Maximum MMA content: 10 % wt Actual: 3%	The permittee shall keep a separate record of the styrene and MMA monomer contents for each shipment of resin and/or gelcoat received.
	VOC (including Styrene)	1126 lb/day Actual: 341 lb/day	Resin	Calendar Day: 5,460 lbs Actual: 1,212 lbs 12 month rolling time period: 531,360 lbs Actual: 334,892 lbs Maximum Styrene Content: 43 % wt Actual: 35%	The permittee shall keep the following information for each calendar month for EU-LAMINATION: a.The identity and amount (in pounds or gallons) of each material used on a daily and monthly basis b.The styrene content of each material used c.The MMA content of each material used d.The acetone content of the lacquer primer and thinner used e.The VOC content of each material used f.The VOC and MEK content of the catalyst used
	VOC (including styrene)	26.0 tpy Actual: 6.0 tpy	Catalyst	Calendar Day: 108 lbs Actual: 32 lbs 12 month rolling time period: 10,842 lbs Actual: 6,337 lbs	The appropriate emission factor for each raw material used (specify the application method and applicable monomer contents)
					Calculations determining the total daily, monthly and

	Acetone	0.6 tpy Actual 0.0 tpy	Patch Booster	Calendar Day: 96 lbs Actual: 4 lbs 12 month rolling time period: 800 lbs Actual: 99 lbs	annual usage rates for each material, The annual usage rates shall be calculated based upon a 12-month rolling time period as determined at the end of each calendar month
			Polyvinyl Alcohol (PVA)	12 month rolling time period: 504 gal Actual: 6 gal	Styrene emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month
			Lacquer Primer	12 month rolling time period: 300 gal Actual: 5 gal	VOC emission calculations determining the daily emission rate in pounds per calendar day.
					VOC emission calculations

			Thinner	*12 month rolling time period: 600 gal Actual: 5 gal*	*determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month*
					Acetone emission calculations determining the monthly emission rate in pounds per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month
Records Checked	Yes	Yes	Yes	Yes	Yes
Compliance Status	Compliance	Compliance	Compliance	Compliance	Compliance

Emission Limits: EU-GELCOAT

Description: One dry filter spray booth for gelcoat processes. Materials used may include gelcoats, tooling gelcoats, catalyst, and primer surface. Gelcoating process may be done in either lamination booth.Records were reviewed and are attached to the report.

12 month rolling time period calculations are based on a time period from October 2014- November 2015. Recorded values are listed as actual in the table below.

	Emission Limits		Materials Limits		Monitoring/Record Keeping
	Styrene	*16.0 tpy Actual: 0.47 tpy*	*Gelcoat*	*12-month rolling time period: 156, 000 lbs Actual: 113, 960 lbs Maximum Styrene Content: 38 % wt Actual: 36.91% Maximum MMA content: 10 % wt Actual: 3%*	*The permittee shall keep a separate record of the styrene and MMA monomer contents for each shipment of gelcoat received.*
					The permittee shall keep the following

EU-GELCOAT	VOC (including Styrene)	354 lb/day Actual: 26 lb/day	Catalyst	12-month rolling time period: 3000 lbs Actual: 1399 lbs	information for each calendar month for EU-GELCOAT:The identity and amount (in pounds) of each gelcoat and catalyst used on a daily and monthly basis The amount, in gallons, of primer surfacer used on a calendar month basis.The styrene, MMA and VOC content of each gelcoat usedThe VOC and MEK content of the catalyst used.The VOC and styrene content of the primer surfacer used.The appropriate emission factor for each raw material used (specify the application method and applicable monomer contents)
	VOC (including styrene)	26.0 tpy Actual: 7.39 tpy	Primer Surfacer	12-month rolling time period: 996 lbs Actual: 253 lbs	Calculations determining the total monthly and annual usage rates for each material, The annual usage rates shall be calculated based upon a 12-month rolling time period as determined at the end of each calendar month
					Styrene emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at

					the end of each calendar month *VOC emission calculations determining the daily emission rate in pounds per calendar day* *VOC emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month*
Records Checked	Yes	Yes	Yes	Yes	Yes
Compliance Status	Compliance	Compliance	Compliance	Compliance	Compliance

	Emission Limits		Monitoring/Record Keeping
EU-CLEANUP	*Acetone*	*24.0 tpy Actual: 4645 lbs = 2.32 tpy*	*The permittee shall keep the following information on a monthly basis for EU-CLEANUP: The identity of each clean-up solvent used The amount (in gallons or pounds) of each clean-up solvent used, gallons or pounds of each clean-up solvent reclaimed.Acetone emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month*

	VOC	*10.1 tpy Actual: 2.56 tpy*	*VOC emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month*
Records Checked	**Yes**	**Yes**	**Yes**
Compliance Status	**Compliance**	**Compliance**	**Compliance**

	Emission Limits		**Monitoring/Record Keeping**
EU-ADHESIVE	*VOC*	*1.6 tpy Actual: 0 tpy*	*The permittee shall keep the following information on a monthly basis for EU-ADHESIVE:The identity of each adhesive used The amount (in gallons or pounds) of each adhesive used Where applicable, gallons or pounds of each adhesive reclaimed The VOC content of each adhesive used*
			VOC emission calculations determining the monthly emission rate in tons per calendar month, and the annual emission rate in tons per 12-month rolling time period

			as determined at the end of each calendar month
Records Checked	**Yes**	**Yes**	**Yes**
Compliance Status	**Compliance**	**Compliance**	**Compliance**

Emissions did not exceed the emission limits in the ROP. It appears DGP, Inc. was in compliance with all aspects of the ROP at the time of my inspection.

NAME [signature] DATE 12-16-15 SUPERVISOR [signature]