

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Orafol Automotive Graphics	SRN : N2702
Location : 57 Kay Industrial Dr.	District : Warren
	County : OAKLAND
City : LAKE ORION State: MI Zip Code : 48359	Compliance Status : Non Compliance
Source Class : SM OPT OUT	Staff : Jillian Cellini
FCE Begin Date : 1/26/2009	FCE Completion Date : 7/18/2024
Comments : Compliance period: May 2019 - May 2024. Based on my inspection observations and records review, this facility appears to be in violation of PTI 46-13A (EU-LINE1, SC V.1).	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/18/2024	On-site Inspection	Non Compliance	Evaluate Orafol and Orafol Automotive Graphics's compliance with PTI 305-05J, PTI 46-13A, and State and Federal air quality rules and regulations.
05/16/2024	Malfunction Abatement Plan	Compliance	MAP for Orafol in accordance with Section III.3 of Permit to Install 46.13A, dated November 1, 2022. Effective date May 8, 2024.
03/19/2024	Other Non ROP		Notification of wet commissioning on EU Line 2 at KPMF as required in PTI 46-13A, FG-2022 SC VII.1.
03/15/2023	Other Non ROP		Request to Use Manufacturer's Data in Lieu of EPA Method 24 (PTI 305-05J).
11/04/2022	On-site Inspection	Compliance	ROP Opt-out and MACT Synthetic Minor, CMS scheduled FY 2023 inspection of Kay Automotive Graphics ("Kay") located at 57 Kay Industrial Dr., Lake Orion, MI 48359-1832.

Activity Date	Activity Type	Compliance Status	Comments
05/10/2022	Annual Emissions Report (or MAERS)	Compliance	MAERS audit complete. Audit passed. Facility reported emissions from all permitted equipment and all exempt equipment/processes that must be reported to MAERS. Mass balance used to calculate emissions VOC emissions. 98% control efficiency was used for EU-CoatingLn though testing indicated the control efficiency of the RTO was 99.85%. Reported VOC emissions are within permit limit. Facility-wide reported VOC emissions for RY 2021 were 32.24 tons.
05/17/2021	Annual Emissions Report (or MAERS)	Compliance	MAERS Report Submission. MAERS audit complete. Audit passed. Facility reported emissions from all permitted equipment and all exempt equipment/processes that must be reported to MAERS. Mass balance used to calculate emissions VOC emissions. 98% control efficiency was used for EU-CoatingLn though testing indicated the control efficiency of the RTO was 99.85%. Facility-wide reported VOC emissions for RY 2020 were 22.74 tons.
09/30/2020	Other Non ROP	Compliance	Email from Orafol stating that, while doing monthly air emissions reporting, it was discovered that an ink that registered through their system at a VOC content of above 6.5 lbs/gal was used in January 2020. According to the notification, the ink is from an old work order and was used for a service repair job, so it isn't likely something that would be used often. Based method 24 sample results, they determined the VOC content of this coating is 6.564 lbs/gal & their system rounded it up to 6.6 lbs/gal. Upon AQD review of additional records, AQD determined the facility is in compliance. Determination details can be found in manila folder at the Warren District office.
09/01/2020	Other Non ROP		Received request from Orafol to use manufacturers formulation data for determination of VOC contents for all record keeping purposes in lieu of Method 24.

Activity Date	Activity Type	Compliance Status	Comments
04/30/2020	Annual Emissions Report (or MAERS)	Compliance	MAERS Report submitted on time. Audit Complete. Source used mass balance and provided emissions calculations for all equipment/processes except the burning natural gas in ovens and thermal oxidizer. MAERS/EPA emission factors were used for emissions from the ovens and thermal oxidizers. 2019 coating/solvent throughput same order of magnitude as 2018 throughput. Reported VOC emissions are less than permit limits.
05/22/2019	Annual Emissions Report (or MAERS)	Compliance	MAERS Report submitted on time. Audit Complete. Source used mass balance and provided emissions calculations for all equipment/processes except the ovens and thermal oxidizer. Reported emissions match data collected during FY 2018 FCE. MAERS/EPA emission factors were used for emissions from the ovens and thermal oxidizers. 2018 coating/solvent throughput comparable to 2017 throughput.
08/07/2018	Scheduled Inspection	Compliance	Evaluate Kay Automotive Graphics's compliance with PTI 305-05J, PTI 46-13, and State and Federal air quality rules and regulations.
04/30/2018	Annual Emissions Report (or MAERS)	Compliance	MAERS Report Submission. Report received on time. Passed audit after reviewing MAERS report, AQD files, and supporting calculations.
05/16/2017	Annual Emissions Report (or MAERS)	Compliance	MAERS Report Submission May, 16, 17, completed the review of MAERS. Please note: for EUCoatingLn, a 98% control efficiency is applied..
05/24/2016	Annual Emissions Report (or MAERS)	Compliance	MAERS Report Submission
11/18/2015	Other	Compliance	Email exchange regarding whether a permit to install is required for replacing the mobile screen printing press portion of EU-PRINT001 and EU-PRINT004 of PTI No. 305-05H. I advise that Rule 285(c)(iii) may apply, but ultimately it is the company's responsibility to decide exemptions. See email in manila folder.

Activity Date	Activity Type	Compliance Status	Comments
07/07/2015	Stack Test	Compliance	Report received timely and complete. DE appears to be greater than 98%.
06/04/2015	Stack Test Observation	Compliance	On-site observation
05/22/2015	Annual Emissions Report (or MAERS)	Compliance	MAERS Report
05/08/2015	Telephone Notes	Compliance	<p>On May 8th, 2015 I talked with Mr. Joshua Flood, EHS Manager at Kay Automotive Graphics, about odors at the facility on the morning of May 6th. Air Quality staff had learned of strong odors at the facility from Jeanette Noechel, Environmental Quality Specialist in the Office of Waste Management and Radiological Protection (OWMRP). Ms. Noechel informed AQD staff of a strong solvent odor in the area at 10:30 am on May 6th when OWMRP conducted an inspection at the facility. The solvent odor was picked up throughout the Kay Automotive Graphics building.</p> <p>Mr. Joshua Flood said there were no malfunctions or new chemicals or high volumes at that time. Mr. Flood provided a daily ink report for Kay Automotive. He thinks coating C625 on Line #6 has a stronger odor than other coatings and may have caused the solvent odor that Ms. Noechel experienced. Around 4 gallons of coating C625 were used around 8 am. Kay Automotive always keeps doors closed for security reasons and last had an alleged odor complaint in December of 2012.</p>
02/23/2015	Other Non ROP	Compliance	Notification that construction on equipment in PTI 46-13 was completed January 14, 2015. This appears to be in accordance with SC EUCoatingLn VII.1 and R 201 (7)(a).
06/09/2014	Scheduled Inspection	Compliance	Annual Inspection of a Synthetic Minor Source

Activity Date	Activity Type	Compliance Status	Comments
01/04/2012	Complaint Investigation	Compliance	AQD received the PEAS call at about 12:05 PM. He complained about smelling "chemical smell" from a source nearby Lapeer Road and Brown Road. The odor has been occurring for a while. First discovered on 12/18/2011 at 6 PM. He contacted Lake Orion Township office who advised him to contact MDEQ. (Note: An investigation of a similar complaint in the area identified this facility as the possible source of the odor.)
12/22/2011	Complaint Investigation	Unknown	Odor observation.
03/02/2011	Scheduled Inspection	Compliance	Targeted Inspection of a SM Source
01/26/2010	Self Initiated Inspection	Compliance	Self Initiated Inspection
03/10/2009	Annual Emissions Report (or MAERS)	Compliance	2008 MAERS Report - Timely submittal

Name: *Jillian Cellino* Date: 7/18/2024

Supervisor: *K. Kelly*