

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

N528232029

FACILITY: Fiber-Tech Industries, Inc.		SRN / ID: N5282
LOCATION: 1637 Marty Paul Street, CADILLAC		DISTRICT: Cadillac
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT: Gary Bigger, Plant Manager		ACTIVITY DATE: 10/26/2015
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection and record review		
RESOLVED COMPLAINTS:		

On October 26, 2015, I inspected Fiber-Tech Industries in Cadillac. This facility suspended operations in July, 2009. The company has kept their Renewable Operating Permit active because they hope to return this facility to operation when the market improves.

I found one minor violation during this inspection. Permit conditions require the spray booths to exhaust unobstructed vertically upward, but one of them has a stack cap which prevents this. As the plant is not operating and there is, therefore, no exhaust, I will use enforcement discretion and not send a violation notice at this time. Instead, I will inform the company of this issue via copy of this inspection report.

Mr. Gary Bigger showed me around during my on-site inspection. Mr. Roger Mola of Fiber Tech in Ohio provided me copies of facility records to review for compliance with permit conditions.

Renewable Operating Permit MI-ROP-N5282-2012, Table FGRECIPROCATING, Condition I.4, limits acetone emissions to 9.2 tons per year. According to their MAERS report for 2014, the facility used 0.23 tons of acetone. This complies with the emission limit.

Mr. Bigger explained to me that although the facility is shut down, they still use a small amount of acetone to clean the equipment.

Conditions I.1 through 3 and I.5 through I.15 contain many emission limits based on use of gel coat and resin. As the facility is not currently using any gel coat and resin, the facility has no emissions from them. This complies with the emission limits.

Conditions II.1 through II.7 contain material usage limits on gel coat and resin. As the facility has not used any, it is in compliance with these limits.

Condition III.1 requires that FGRECIPROCATING should not operate unless the exhaust filters are installed and operating properly. The exhaust filters were not in place on the three spray booths of this flexible group at the time of my inspection. This was not a violation because the equipment is not operating. Therefore the facility is in compliance with this permit condition.

Condition III.2 requires an impervious film be applied to the wet surface of the mold as soon as possible after the application of each layer of resin. This condition is not applicable when the facility is not applying any resin. Mr. Bigger explained that they would lay Mylar film across the wet surface of gel coat and resin on the panels they manufactured, in order to confine the solvents in the resins to the piece they were building. Then the styrene gets consumed and bound up in the material, as it should be. They would then peel the Mylar film off and reuse it.

Condition III.4 requires keeping tanks, transfer totes, and containers for gel coat and resin closed or covered except when adding or removing materials. Mr. Bigger showed me a resin storage tank which, he says, is empty. In any case it appeared to be closed in compliance with this condition.

Conditions VI.1 through VI.6 and VI.10 require keeping records of resin and gel coat usage, their styrene and organic HAP content, and styrene and organic HAP emissions. The facility has not used resin or gel coat this year, therefore they have no emissions to calculate.

Condition VI.7 requires keeping track of acetone used per month. Example records (attached) include this information.

Condition VI.8 requires keeping track of acetone sent offsite for recycling or disposal. The company is not using enough acetone to send it offsite for recycling or disposal at this time.

Condition VI.9 requires calculating acetone emissions. Example records (attached) include this information.

Condition VII.1 requires prompt reporting of any deviations. As the facility is within limits on acetone usage and is not operating otherwise, there are no deviations.

Condition VII.2 and VII.3 require annual and semiannual certifications and deviation reports. The company submitted these reports for 2014. The semi-annual report for the second half of 2014 and the 2014 annual certification arrived January 9, 2015. This is on time. AQD accepted them as correct and properly certified. The first-half 2015 semiannual report arrived July 13, 2015. This is on time. AQD accepted this report as correct and properly certified.

Condition VII.4 requires a semiannual report for compliance with 40 CFR 63, subpart WWWW. These reports were included with the semiannual and annual deviation reports and certifications. The AQD accepted these reports as correct and properly certified.

Condition VIII.1, 2, and 3 set stack dimensions for the three spray booths in the facility. Two of these are 18 inches in diameter and one 34 inches in diameter; all three have a minimum height of 40 feet above ground level. The stacks appeared to be of about the proper dimensions, although I was not able to estimate their height with any precision.

The permit conditions require that the stacks exhaust unobstructed vertically upward. The stack farthest to the west, along the rear wall of the facility, did not appear to meet this condition, as it appears to have a cone-shaped cap; the other two stacks have no-loss caps. I will use enforcement discretion to forego a Violation Notice for this problem, since the facility is not operating at this time. I will inform the company of this problem via copy of this report.

Documents provided by the company state that the spray booths have not operated in several years. I saw no evidence that they had operated recently. Except for some fiberglass cloth which was very dusty, I didn't see any materials on hand which would indicate the possibility of a quick return to operation.

The (disposable) exhaust filters were missing from the spray booths, but the booths themselves and the spray equipment appeared to be in good condition.

NAME William J Rogers Jr

DATE 11/3/2015

SUPERVISOR 