

N7697

Mawila

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

N769727852

FACILITY: FINTEX, LLC		SRN / ID: N7697
LOCATION: 8900 INKSTER RD, ROMULUS		DISTRICT: Detroit
CITY: ROMULUS		COUNTY: WAYNE
CONTACT: Kent DesJardins , President		ACTIVITY DATE: 11/21/2014
STAFF: Usama Amer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Inspection of an Opt-out Source		
RESOLVED COMPLAINTS:		

On November 21, 2014, I conducted a Scheduled Inspection at Fintex, LLC (facility), located at 8900 Inkster Rd., Inkster, Wayne County. The inspection was to determine the facility's current compliance status with the federal Clean Air Act of 1990, as amended; Part 55 of Michigan Public Act 451 of 1994, as amended; the administrative rules, and the conditions of AQD PTIs No. 60-09 and No. 68-09. Mr. Kent M. DesJardins, President, represented the facility during the inspection.

BACKGROUND & PROCESS DESCRIPTION

The facility is a coating plant that applies a special finishing technology for the automotive industry. For the most part, the facility applies rust preventative coatings/adhesives to fasteners. The facility's cleanup operations occur at the end of each production day, or if a line runs multiple production days continuously then the cleanup operation occurs at the end of the run. The appropriate solvent for the material being run (toluene or t-butyl acetate) is used for cleanup. The cleanup solvent is allocated to the production line where it is used and is included in the VOC emissions" calculations table as shown in Attachment A.

The facility has 20 employees per shift, and operates 3 shifts per day and 6 to 7 days per week.

PTI No. 60-09 was issued to the facility as a General Permit to limit the VOC emissions to not more than 10 tpy per line for coating lines No. 1 through No. 5. Line No. 6 is exempt from R 201 pursuant to R287(c), while Line No. 7 is exempt from R 201 pursuant to R290. Lines No. 6 and 7 are included in this PTI, because the emissions from these 2 lines are to be accounted for in the 30 tpy limit for FG-SOURCE.

Additionally, PTI No. 68-09 was issued, to the facility, as an Opt-out Permit to limit the HAPs emissions to not more than 10 tpy per individual HAP, and to not more than 25 tpy for aggregate HAPs for the above 7 coating lines.

THE INSPECTION

AQD PTI No. 60-09

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. Coating lines may be used to coat any substrate except cans, coils, large appliances, metal furniture, magnet wire, fabrics, paper, vinyl, flat wood paneling, or graphic arts lines.

SPECIAL CONDITIONS (S. C.)

* S. C. #1 stipulates that the VOC emission rate not to exceed 2000 lb/month, based on a calendar month for each coating line plus all associated purge and clean-up operations.

* S. C. #2 stipulates that the VOC emission rate not to exceed 10 tpy, based on a 12-month rolling time period as determined at the end of each calendar month, for each coating line plus all associated purge and clean-up operations.

- The facility provided VOC emissions data that showed compliance with the above 2 conditions. The maximum VOC emission rates of (Attachment A):

- 1) 0.24 tpm from Line P2 was reported in September, 2013 and 8.04 tpy annually for December 2013
- 2) 0.25 tpm from Line P2 was reported for June, 2014 and 8.49 tpy annually for March, 2014

FG-SOURCE

All coating lines and all associated purge and clean-up operations at the stationary source. This includes any coating line covered by this or any other general permit or any permit to install issued pursuant to Rule 201, and any coating line exempt from the requirement to obtain a permit to install pursuant to Rule 287 and/or Rule 290.

SPECIAL CONDITIONS (S. C.)

* S. C. #1 stipulates that the VOC emission rate not to exceed 30 tpy, based on a 12-month rolling time period as determined at the end of each calendar month, for the entire facility.

- The facility provided VOC emissions data, which include HAPs data, that showed compliance with the above condition. The maximum VOC emission rates, based on a 12-month rolling time period as determined at the end of each calendar month, were reported as follows (Attachment A):

- 1) 8.04 tpy for December, 2013
- 2) 8.49 tpy for March, 2014

AQD PTI No. 68-09

FG-FACILITY –

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

The FG includes the following EUs:

EUFlowCoat1, EUFlowCoat2, EUFlowCoat3, EUFlowCoat4, EUFlowCoat5, EUFlowCoat6, and EUNylon7

SPECIAL CONDITIONS (S. C.)

S. C. #1 stipulates that the emission rate of any individual HAP not to exceed 9.0 tpy, based on a 12-month rolling time period as determined at the end of each calendar month.

S. C. #2 stipulates that the emission rate of the aggregate HAPs not to exceed 22.5 tpy, based on a 12-month rolling time period as determined at the end of each calendar month.

- The facility provided HAPs emissions data that showed compliance with the above 2 conditions. The maximum single HAP (Toluene), and aggregate HAPS emission rates of 7.04 tpy, and 7.90 tpy, respectively, were reported for August, 2014. Attachment B

- Attachment C is provided to show compliance with S. C. #VI.2.

CONCLUSION

Fintex appears to be in compliance with the conditions of PTIs No. 60-09 and No. 68-09, and the applicable Air Pollution Control Rules.

NAME Sam Amer

DATE 3/5/15

SUPERVISOR JK