

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

P037454872

FACILITY: PLASAN CARBON COMPOSITES		SRN / ID: P0374
LOCATION: 3195 WILSON DRIVE, WALKER		DISTRICT: Grand Rapids
CITY: WALKER		COUNTY: KENT
CONTACT: Brenda Wisniewski , Environmental Health and Safety Specialist		ACTIVITY DATE: 08/31/2020
STAFF: Adam Shaffer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled unannounced inspection. Records request prior to site inspection - 08/18/20		
RESOLVED COMPLAINTS:		

An inspection was completed by Air Quality Division (AQD) staff Adam Shaffer (AS) for Plasan Carbon Composites (PCC) and Plasan North America (PNA) consisting of a records request on August 18, 2020 and a scheduled unannounced inspection on August 31, 2020. The purpose was to determine PCC and PNA's compliance with Renewable Operating Permit (ROP) No. MI-ROP-P0374-2017b, NESHAP Subpart PPPP, and all other applicable air pollution control rules. Prior to sending the records request it was verified with company staff that the facilities were in operation. Additionally, it was verified the day of the site inspection that there would be no problems with an onsite visit due to the current COVID-19 pandemic.

Facility Description

PCC and PNA (Plasan) is a manufacturer of high-end carbon composite products, with PCC producing more automotive products and PNA designing and manufacturing composite products for military and industrial application. PCC is located in Plant 1 (3195 Wilson Drive) and PNA is located in Plant 2 (3236 Wilson Drive Suite A). PCC and PNA had been previously determined to be considered one stationary source. The facility is a major source of volatile organic compounds (VOCs) and opt out for Hazardous Air Pollutants (HAPs) and is in operation under Renewable Operating Permit No. MI-ROP-P0374-2017b. Historically, the facility became subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart PPPP due to EPA's "Once in always in" policy when the facility exceeded HAP emission limits in 2015 and became a major source of HAPs. Following this Plasan took enforceable permit conditions to limit HAP emissions. Since then the Environmental Protection Agency has rescinded the "Once in always in" policy. The facility was subject to Consent Order AQD No. 15-2016, which required compliance with the NESHAP Subpart PPPP; however, the consent order was terminated on August 8, 2019. It is noted that compliance with the NESHAP Subpart PPPP is still required through the current MI-ROP-P0374-2017b.

Offsite Compliance Evaluation

MAERS 2019 – Based on the timing of the inspection, the 2019 MAERS Report was reviewed as part of the compliance evaluation. The 2019 MAERS Report was failed twice during the course of reviewing the report. The first time was due to errors noted for two emission units and to attach applicable information. The second time was due to the company identifying errors in the report and failing the report in order for the company to correct the errors identified. After further review of the corrected 2019 MAERS Report, no significant errors were identified overall, and the report appeared acceptable. The 2019 MAERS Report reported emissions appear consistent with select records later provided. ROP Certification / NESHAP Subpart PPPP Reports – Previous ROP certification and NESHAP Subpart PPPP reports were reviewed prior to the inspection as well as recently submitted ROP certification reports following the inspection. The last deviation was in 2019

due to a late submittal of the NESHAP Subpart PPPP Report. The most recent NESHAP Subpart PPPP Report was submitted in a timely manner. The submitted ROP certification reports reviewed appeared to indicate no apparent issues and were acceptable.

Compliance Evaluation

As stated above a records request was submitted to Plasan staff on August 18, 2020 to verify compliance with MI-ROP-P0374-2017b and select air pollution control rules. The onsite inspection was completed on August 31, 2020. The MI-ROP-P0374-2017b is a sectioned ROP and will be discussed separately, however, overall compliance for the site will be evaluated together.

AQD staff AS arrived on site at 10:14 am on August 31, 2020. Weather conditions at the time were sunny skies, temperatures in the middle 60°s degrees F and winds from the southeast at 5-10 mph. Prior to entering the site offsite observations were made. No emissions were observed, and a plastic odor was noted to the north of the facility, however, no recent odor complaints have been received regarding Plasan. Upon arrival, AS met with Ms. Brenda Wisniewski, Environmental Health and Safety Specialist, who provided a tour of the facility, answered site specific questions and provided requested records. Additionally, AS met with Mr. Wayne DeGroot, Paint Engineer / Supervisor, who also answered site specific questions while onsite. Proper PPE and social distancing were maintained whenever possible.

MI-ROP-P0374-2017b - Section 1

Source Wide Conditions

This section is subject to individual / aggregate HAP source wide emission limits of 9.9 and 24.9 tons per year (tpy) respectively per a 12-month rolling time period. Records were requested and reviewed for select months. Reviewing the records provided, Plasan is keeping track of individual / aggregate HAPs for both sections of their ROP. For the month of June 2020, approximately 0.00548 tons of combined (section 1 and section 2) aggregate HAPs were emitted and as of June 2020, 0.22 tpy of aggregate HAPs were emitted per a 12-month rolling time period which is well within the individual and aggregate HAP emission limits. Previous 12-month rolling time periods of aggregate HAP emissions were reviewed and also appear to be within permitted limits. Additionally, Plasan is subject to a styrene emission limit of 2.0 tpy per a 12-month rolling time period. For the month of June 2020, Plasan appeared to emit no styrene emissions (section 1 and section 2 combined), and as of June 2020, Plasan appeared to emit no styrene emissions per a 12-month rolling time period. Previous 12-month rolling time periods reviewed were also well within the permitted limit.

Per Special Condition (SC) V.1, Plasan shall utilize manufacturers formulation data to determine the HAP contents for each HAP containing material received and applied. Manufacturers formulation data was requested for the topmost used materials and provided. Upon review of the materials provided, some information was in the form of Safety Data Sheets (SDS). After discussing this further with Plasan staff it was determined that Plasan has had difficulty in obtaining manufacturers formulation information from select suppliers. Additionally, HAP contents from the SDS were not consistent with HAP contents used in determining emissions. This was explained by Plasan staff that the new reporting database they use takes a weighted percent value based on the other components of each material instead of a worst case.

It was concluded that the use of SDS for select materials that Plasan has difficulty in obtaining in order to determine HAP contents is acceptable at this time. This decision may

be revisited in the future if HAP emissions increase significantly. However, for all SDS that Plasan is using in order to determine HAP contents, a worst-case content approach shall be used. Based on how low source wide aggregate HAP emissions combined are (<0.5 tpy) it is highly unlikely that Plasan has exceeded any HAP emission limits due to the errors noted.

Per SC 2.a-e, Plasan shall keep on a monthly basis, gallons of each HAP containing material used, reclaim if applicable of each HAP containing material, HAP contents of each material used and individual / aggregate monthly / 12-month rolling time period emissions. Records were requested and provided. Plasan recently switched to a different reporting system and provided records are compiled over a specific time period. After further review this appears acceptable and Plasan appears to be keeping track of usage rates, reclaim, HAP contents and monthly / 12-month rolling time period emission rates. Additionally, Plasan appears to be keeping track of monthly / 12-month rolling time period styrene emissions as required per SC.3.

EUCARBONMOLD

This emission unit is for the twelve (12) oil-heated molding presses with a 3.2 MMBtu/hr natural gas-fired boiler to heat the oil, two (2) electrically heated autoclaves, and one (1) natural gas-fired autoclave.

Onsite Observations

This emission unit was observed during the course of the site inspection. Six of the twelve oil-heated presses remained at the time of the inspection. Plasan staff stated that the presses have not been in operation since September 2019. After further review, Plasan appeared to be properly capturing and storing all waste materials and limiting open containers when not in use to prevent fugitive emissions.

Records Review

This emission unit is subject to a VOC emission limit of 2.9 tpy per a 12-month rolling time period. For the month of June 2020, 400 lbs of VOCs were emitted. As of June 2020, 1.00 ton of VOCs were emitted per a 12-month rolling time period. Previous 12-month rolling time periods reviewed also appeared to be within the applicable limit. This emission unit is also subject to an instantaneous VOC material limit of 6.4 lbs/gal minus water as applied. A list of the VOC contents for materials used in this emission unit were requested and provided. The VOC contents for materials used appeared to be within the permitted limit. During the inspection it was verified by Plasan staff that the VOC contents received were directly from the manufacturer. Supporting documentation was provided to verify the VOC contents. Upon review, errors were noted in VOC contents in documentation provided compared to VOC emission records. However, based on how low reported usages and emissions are, it is highly unlikely that an emission limit was exceeded. Moving forward these errors will be corrected. Per SC VI.2a-d, Plasan shall keep track of usage rates of each VOC containing material, the VOC contents of each material, and the monthly / 12-month rolling time periods of VOC emissions. Records were requested for select months and reviewed. After further review, it appears that Plasan is keeping track of usage rates, VOC contents, and monthly / 12-month rolling time periods of emissions.

EUPULTRUSION

This emission unit is for the single pultrusion line in which reinforcing fiber materials are pulled through a resin bath and then a series of preform plates which shape the coated fibers into the desired profile. The coated fibers are then drawn through a heated die which initiates an exothermic reaction and polymerizes the thermosetting resins to product composite rods and tubes. The finished product is then cut to desired lengths with a wet

saw. This unit was originally in PCC but had been relocated to PCC upon the approval of PTI No. 180-19 that has since then been rolled into their current ROP.

Onsite Observations

This emission unit was observed during the course of the inspection but was not in operation. Plasan staff verified that the unit has not been in production since it was relocated to the PCC site.

Records Review

This emission unit is subject to a 4,000 lb / yr VOC emission limit per a 12-month rolling time period. Additionally, this unit is subject to an acetone emission limit of 790 lbs/yr per a 12-month rolling time period. Records were requested and reviewed. Upon review of the records provided, the last reported VOC 12-month rolling time period emissions was January 2020, with 0.06 tons of VOCs being reported that is well within the permitted limit. The last reported acetone 12-month rolling time period emissions was January 2020, with 120 lbs / yr acetone emissions being reported that is well within the permitted limit. Previous 12-month rolling time periods of VOC and acetone emissions were also well within the permitted limits. It should be noted that these 12-month rolling time period reported emissions would be carry over for when the unit was in operation at PNC. Per SC 3.a-f, Plasan shall keep track of usage rates of each material, VOC / acetone contents of each material used, appropriate emission factors for each material used, and VOC / acetone monthly / 12-month rolling time period emissions. Records were requested for select months and reviewed. Emissions factors were provided for the materials that are used for this emission unit and appeared to be what was historically used. Records indicated that the unit has not been in operation since at least July 2019. Additionally, it would appear that the recordkeeping format recently implemented for records would indicate that all necessary items would be recorded when operation is started.

One stack is listed in association with this emission unit. Though the dimensions for this stack were not measured they appeared to be consistent with what is listed in MI-ROP-P0374-2017b.

EUADHESIVE

This emission unit is for the robotic bonding process in the open plant area.

Onsite Observations

This emission unit was observed during the inspection and was not in operation. It was later determined that EUADHESIVE had ceased production of their previous product (roofs and hoods) in November 2019 and are now only producing splitters. Containers observed were closed. Plasan staff explained the application process and how the adhesive is mixed and applied as a bead of adhesive and not sprayed. After further review this is acceptable.

Records Review

This emission unit is subject to a VOC and acetone combined emission limit of 10 tpy per a 12-month rolling time period. Records were requested and reviewed for select months. Upon review of records, Plasan records separate out both units. For the month of June 2020, 0.00134 tons of combined VOC and acetone emissions were reported. As of June 2020, 0.38 tpy of combined VOC and acetone emissions were emitted per a 12-month rolling time period. Previous combined VOC and acetone emissions reviewed were also well within the permitted limit. This emission unit is also limited to a 0.34 lb/day MDI Isomer limit. Records were requested and reviewed back to June 2019. The last reported usage day of MDI Isomer was November 4, 2019. Daily records reviewed all appeared to be within the permitted limit.

This emission unit has an instantaneous limit for VOC content for primers of 4.7 lb/gal and a second instantaneous limit for VOC content for adhesives of 0.24 lb/gal. Based on the

records reviewed the highest VOC content for the primers used was 4.65 lb/gal and the highest VOC content for the adhesives was 0.22 lb/gal. This appeared to be acceptable. Plasan had previously requested to use manufacturers formulation data instead of Test Method 24 to determine the VOC contents for materials used by this emission unit. Supporting documentation was requested for select materials used and VOC contents were verified.

Per SC VI.3a-d, Plasan shall keep track of usage rates, VOC contents and monthly / 12-month rolling time periods of VOC / acetone emissions. Records were requested and reviewed back for select months. Based on the records reviewed it appears that Plasan is keeping track of usage rates, VOC contents and monthly / 12-month rolling time periods of VOC and acetone emissions.

FGPAINT

This flexible group is for the two conveyerized paint lines (EUPAINTLINE-1 and EUPAINTLINE-2) for spray coating of plastic automotive parts. EUPAINTLINE-1 is subject to CAM and requirements are included in FGCAMPLAN. Dry overspray filters are on both lines, and the regenerative thermal oxidizer (RTO) would control both portions of the booth and the final section (referred to as the "Radiant Zone") of the cure oven on EUPAINTLINE-1 when in operation.

During the inspection it was determined that EUPAINTLINE-2 is still not in operation since the 2018 inspection. The RTO was shut down on October 19, 2018 and has not been turned on nor any maintenance completed for the unit. It should be noted that the one line still being used (EUPAINTLINE-1) can still operate without the RTO controlling emissions per MI-ROP-P0374-2017b. Specifics requirements when EUPAINTLINE-1 is in operation without the RTO are discussed further below.

Onsite Observations

During the inspection, EUPAINTLINE-1 was not observed in operation. The EUPAINTLINE-1 consisted of a wash system, drying oven, flash tunnel, curing oven, and six robotic spray application units / six manual spray application units. A separate paint kitchen area was observed adjacent to the line. No open containers were observed. Filters for EUPAINTLINE-1 were observed and appeared to be acceptable. Spent filters are disposed of offsite. A magnehelic gauge is installed for both fresh air flow pulled in from outside and for filtered air being pushed outside. For the inflow rate, Plasan staff stated they change filters when the pressure drop is around 1.3" of water column and 1" of water column for exhausted air. Robotic application units are equipped with electrostatic application technology and high-volume low pressure (HVLP) application technology is used for manual spraying. Test caps were stated by Plasan staff to be available. There are five stacks associated with FGPAINT and were observed during the course of the site inspection. Thought the exact dimensions were not measured, they appeared to be consistent with the dimensions identified in MI-ROP-P0374-2017b.

Records Review

Since EUPAINTLINE-2 has not been operation all records reviewed for this flexible group are for EUPAINTLINE-1. This emission unit is subject to a combined emission limit of VOC, acetone, p-chlorobenzotrifluoride, and methyl acetate of 35.0 tpy per a 12-month rolling time period for combined uncontrolled and controlled emissions. Additionally, FGPAINT is subject to a second VOC, acetone, p-chlorobenzotrifluoride, and methyl acetate combined emission limit of 24 tpy per a 12-month rolling time period that applies only to uncontrolled emissions. Emissions for FGPAINTLINE are all uncontrolled so the smaller emission limit will be viewed. For the month of June 2020, 0.17 tons of combined emissions were emitted and as of June 2020, 3.69 tpy of emissions were reported 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 limits.

FGPAINT is also subject to a daily p-chlorobenzotrifluoride emission limit of 106.8 lbs. Daily records were requested and reviewed back through June 2019. The highest daily emission of p-chlorobenzotrifluoride is 18.92 lbs which is well within the daily limit. FGPaint is also subject to a 12-month rolling time period limit for p-chlorobenzotrifluoride of 8.1 tpy. For the month of June 2020, 7.1 lbs of p-chlorobenzotrifluoride were emitted. As of June 2020, 0.25 tpy of p-chlorobenzotrifluoride were emitted per a 12-month rolling time period which is well within the permitted limit. Previous 12-month rolling time periods reviewed were also within the permitted limit.

FGPAINT is subject to the following daily material limits specifically for EU-PAINTLINE-1 when the RTO is not in operation.

- Primer – 150 gal / day
- Hardener – 50 gal / day
- Clearcoat – 21 gal / day
- Activator – 7.0 gal / day
- Purge Solvent – 8.5 gal / day

Records were requested and reviewed for select time periods. Based on the records reviewed, Plasan appears to be meeting the material limits mentioned above. FGPAINT is also subject to several VOC content material limits that are listed below specifically for EU-PAINTLINE-1.

- VOC Content Primer – 5.0 lb / gal (minus water) as applied
- VOC Content Clearcoat – 4.0 lb / gal (minus water) as applied
- VOC Content Non-Basecoat / Clearcoat – 4.3 lb / gal (minus water) as applied

A list of the VOC contents for materials used by EUPAINTLINE-1 was requested and reviewed. Additionally, supporting documentation was provided to verify VOC contents for several materials. After further review, Plasan appears to be meeting the applicable VOC content material limits.

As mentioned previously, since the EU-PAINTLINE-2 is not in operation and emissions from EU-PAINTLINE-1 are all uncontrolled due to the RTO not in operation, only select records were requested and reviewed. Per SC.3, specifically for records pertaining to EU-PAINTLINE-1 that are uncontrolled, Plasan shall keep track of usages, VOC / acetone / methyl acetate / p-chlorobenzotrifluoride contents, and monthly / 12-month rolling time period VOC / acetone / methyl acetate / p-chlorobenzotrifluoride emissions determined separately and/or combined as specified. Records were requested and reviewed back through July 2019. Based on the records reviewed, Plasan overall appears to be keeping track of usages, contents and monthly / 12-month rolling time periods of emissions.

Per SC.6a-e, Plasan shall keep track of usages of p-chlorobenzotrifluoride materials used, contents, reclaim if applicable, and monthly / 12-month rolling time periods of p-chlorobenzotrifluoride emissions. Records were requested and reviewed back through June 2019. Based on the records provided, Plasan appears to be keeping track of applicable records.

FGCAMPLAN

This flexible group is for the emissions from the paint spray booth, post booth flash tunnel, and the radiant zone of the cure oven associated with EUPAINTLINE-1 are exhausted to the RTO. EUPAINTLINE-1 is subject to CAM.

Onsite Observations

As stated previously, the RTO was turned off on October 19, 2018, and has not been in operation since then. The MI-ROP-P0374-2017b does allow for operation of EUPAINTLINE -1 if the unit is not controlled by the RTO. The destruction efficiency of the RTO was most recently tested in January 2017, and the control efficiency in September 2016. The RTO was observed onsite not in operation. Since the unit has not been in operation, no applicable temperature or control efficiency records were requested. No maintenance has been completed for the RTO since it was turned off.

FGMACTPPPP

This flexible group is for each new, reconstructed, and existing affected source engaged in the surface coating of plastic parts and products. Identified within each of the four subcategories listed in 40 CFR Part 63, Subpart PPPP, 63.4481(a)(2) to (5). Surface coating is defined by 40 CFR 63.4481 as the application of coating to a substrate using, for example, spray guns or dip tanks. Surface coating also includes associated activities, such as surface preparation, cleaning, mixing, and storage if they are directly related to the application of the coating. This flexible group is for EUPAINTLINE-1, EUPAINTLINE-2, EUADHESIVE and EUSPOTPRIME. Since the shutdown of the RTO in 2018, Plasan has chosen the emission rate without add-on control option to demonstrate compliance. FGMACTPPPP has an emission limit for Organic HAPs of 0.16 lb per lb of coating solids per a 12-month rolling time period for new or reconstructed general use coating. The initial compliance notification was previously received on April 22, 2016, and semi-annual compliance reports have been submitted since then. The most recent compliance report was received on August 27, 2020. The highest monthly HAPs reported for 2020 was 2.86 lbs and the highest 12-month rolling total of HAPs / Solids was 0.0545 lbs of HAPs per lb of solids. However, upon review, differences were noted from requested records and previously submitted NESHAP semi-annual compliance reports. When brought to the attention of Plasan staff it was determined that differences were due to Plasan now using worst case HAP emissions for select materials that formulation data is unattainable and SDS are utilized. Additionally, applicable records appear to be more accurate when Plasan switched over to the new reporting system just recently. Plasan submitted monthly / 12-month rolling time period reports for the remaining months back through July 2019 that verified they appear to be in compliance with the Organic HAPs emission limit of 0.16 lb HAP per lb of coating solids as previously determined. The applicable NESHAP semi-annual compliance report for 2019 will be resubmitted to reflect the current information. Based on the records reviewed, Plasan appears to be in compliance with the NESHAP Subpart PPPP regulations at this time.

FGNESHAPZZZZ

This flexible group applies to the emissions units (EUGENERATOR-1 and EUFIREPUMP) that are subject to the NESHAP Subpart ZZZZ for Stationary Reciprocating Internal Combustion Engines (RICE).

EUGENERATOR-1 – This generator was observed during the course of the site inspection. An hour's meter was noted on the unit that read 290.0 hours of operation. Monthly records of hours of operation were provided back through June 2019 and reviewed. A power outage was noted on July 22, 2019, and the unit was run for emergency purposes for 3.2 hours. The remaining hours of operation were for maintenance purposes. Since June 2019, the unit has run 14.1 hours for maintenance. Based on the records provided and speaking with Plasan staff, it appears that the appropriate maintenance is being completed for the unit.

EUFIREPUMP – This emission unit was noted during the inspection and an hour's meter on the unit read 242.0 hours. Monthly records of hours of operation were provided back through June 2019 and reviewed. A power outage was noted on July 22, 2019, and the unit ran for 2.1 hours. The remaining hours of operation were for maintenance purposes. Since June 2019, the unit has run 47 hours for maintenance. Maintenance records were provided and after review appeared acceptable.

Rule 287

Plasan does not utilize the Rule 287 exemption for any equipment / processes located at PCC.

Rule 290

This emission unit would apply for all processes and equipment that would utilize the Rule 290 exemption from air permitting. Plasan utilizes the Rule 290 exemption for RGFINISH. RGFINISH is for the finishing area located on site. RGFINISH consists of EUGP12, EUHood, EURocker, EURoof, and EUViper. No materials are heated during any of the processes. Prior operations for FGFINISH were for hoods / roofs of vehicles and has since then switched to site shields. Records of monthly emissions were requested and provided for select months. Additionally, SDS were provided for the highest used materials and reviewed. From June 2019 through June 2020, approximately 527.81 lbs of VOCs were emitted. Upon review of the SDS materials provided, one material (P17JMCR Black) was noted to contain Talc, a carcinogenic material. Since June 2019, 2.01 gallons of P17 JMCR Black were used which worst cast would equal 13.18 lbs of talc emissions which is well within the emission limit per Rule 290(2)(a)(ii)(B). After further review, it appears that the RGFINISH is exempt per Rule 290(2)(a)(ii).

EUCOLDCLEANER

One cold cleaner was observed during the inspection in the paint kitchen area that uses purge material. No issues were identified for the one cold cleaner during the inspection. The cold cleaner appears to be exempt per Rule 281(2)(h).

MI-ROP-P0374-2017b - Section 2

This section applies to the second building in operation by PNA and located at 3236 Wilson Drive.

Source Wide

This section of the ROP is subject to individual / aggregate HAP source wide emission limits of 9.9 and 24.9 tpy respectively per a 12-month rolling time period. Records were requested and reviewed for select months. As previously mentioned, Plasan is keeping track of both individual and combined individual / aggregate HAPs for both sections of their ROP and 12-month rolling time period emissions for individual / aggregate HAPs and styrene are well within their permitted limits. Based on the records reviewed, Plasan appears to overall be keeping track of usage rates, HAP contents, reclaim and monthly / 12-month rolling time periods of individual / aggregate HAP and styrene emissions.

FGNSPSJJJJ

This emission unit applies to EUGENERATOR-2 that is subject to the New Source Performance Standards (NSPS) for Stationary RICE.

The EUGENERATOR-2 was observed during the inspection located on the north side of PNA. The interior was locked and not accessed at the time of the inspection. Following this photo verification was provided to demonstrate that an hourly meter was installed for the unit. The hourly meter read 287.1 hrs as of the September 17th email when it was provided. Monthly hour records were requested and provided for select months. A power outage occurred onsite July 22, 2019, with the unit operating 2.1 hours. The remaining hours used based on the records were for maintenance purposes. The total hours of maintenance since June 2019 is 23.9 hours. Maintenance records were provided, and a certificate of conformity had been previously submitted.

Rule 287(2)(c)

This emission unit would apply for all processes and equipment that would utilize the Rule 287(2)(c) exemption from air permitting.

Plasan utilizes the Rule 287(2)(c) exemption for EUPRIME which is for priming operations located onsite. The unit was observed during the inspection but not in operation. Monthly usage rates were requested and provided for select months. The highest monthly usage for EUPRIME since June 2019 was 5 gallons in April 2020. The unit appears to be exempt per Rule 287(2)(c).

Rule 290

This emission unit would apply for all processes and equipment that would utilize the Rule 290 exemption from air permitting. Plasan utilizes the Rule 290 exemption for EUMISC which is for all miscellaneous operations completed onsite. It was concluded that no materials are heated when applied. Monthly records were requested and reviewed for select months. Additionally, SDS were provided for the most used materials onsite and reviewed. Based on the records reviewed, from June 2019 through June 2020, approximately 451.79 lbs of VOCs were emitted uncontrolled. Reviewing the SDS provided, there appeared to be no issues regarding screening levels. Based on the records reviewed, EUMISC appears to be exempt per Rule 290(2)(a)(ii).

Additional Observations

- The third building (3111 Wilson Court) was inspected during the course of the inspection.
 - Various cutting, bending, and grinding of parts was observed in this area that would appear to be exempt per Rule 285(2)(I)(vi)(B).
 - A sandblasting area was observed in this building with a dust collector that is vented outside and appeared to be exempt per Rule 285(2)(I)(vi)(C).
 - Welding areas were observed that would appear to be exempt per Rule 285(2)(i).
- Several new units were mentioned to AS by Plasan staff to have been installed at PCC or PNA, however, the units have not begun production. Plasan believed the units would be exempt per Rule 290. Since the units have not yet begun production, no emission records are available at this time.
- During an initial meeting with Ms. Wisniewski, it was inquired as to the status of Plasan's intention to void their ROP and take opt out limits. Ms. Wisniewski stated that company staff plan to meet and further discuss operations moving forward and if it will be necessary to keep the ROP.
- A chemical storage room was observed that stored waste and paint materials.

Conclusion

Based on the facility inspection and records provided, Plasan appears to be in compliance with MI-ROP-P0374-2017b and applicable air pollution control regulations at the time of the inspection.

NAME Adam Shaffer

DATE 09/30/2020

SUPERVISOR HH