DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

P047934337

FACILITY: COMPOSITECH		**SRN / ID:** P0479
LOCATION: 683 LINCOLN LAKE AVENUE SE, LOWELL		**DISTRICT:** Grand Rapids
CITY: LOWELL		**COUNTY:** KENT
CONTACT: Ken Fusee , General Manager		**ACTIVITY DATE:** 04/26/2016
STAFF: Steve Lachance	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: Self-Initiated Inspection based on MAERS Assistance for a tardy MAERS Submittal See CA_P047934337. (SLachance, 4/27/16)		
RESOLVED COMPLAINTS:		

Compositech (d.b.a. Universal Blastco and part of the Industrial Services Group, Inc.) is a fiberglass pipe/tank//fitting manufacturer. It is permitted by Air Quality Division (AQD) Permit to Install (PTI) No. 172-13. This permit is an OPT-OUT permit in that it restricts, through appropriate materials used, recordkeeping and documentation of emissions, styrene (a Hazardous Air Pollutant; HAP) emissions to less than 9.0 tons per 12-month rolling time period. Including possible ancillary VOC emissions, the permit limits total VOC emissions to less than 11.2 tons per 12-month rolling time period (FGRESIN.) The styrene restriction is implicit within this limit, but also expressed separately in FGFACILITY. The permit also limits Acetone emissions to 3.0 tons per 12-month rolling time period.

As an synthetic minor source, having "opted out" of Title V Major Source Renewable Operating Permit program (as well as possible other federal standards for limiting HAP emissions from this type of business, i.e., Part 63 NESHAPs), the source is obligated to participate annually in Michigan's Air Emissions Reporting System (MAERS) per Rule 2 and Policy and Procedures AQD-13. The facility did not meet the March 15 deadline, but did respond to AQD's 4/4/16 Dunning Letter reminding sources of their reporting obligations; and SLachance of AQD began a correspondence with Mr. Ken Fusee, General Manager of the facility, aimed at satisfactorily and expeditiously completing their MAERS submittal.

Over the course of two field days (the afternoons of April 25 and 26, 2016), SLachance and Mr. Fusee reviewed site operations and records, and compared these to the requirements of PTI No. 172-13. Again, while these efforts were primarily directed at developing and submitting a MAERS report, enough information was explored to determine the facility's current compliance status with respect to PTI No. 172-13. SLachance provided a copy of DEQ's "Environmental Inspections; Rights and Responsibilities" brochure at the start of on-site activities on April 25, 2016.

Mr. Fusee had monthly records of material used and estimated emissions available at the start of this first meeting, and these were used to develop the MAERS submittal on-line. The records were consistent with those previously submitted to AQD for MAERS EI2014 and in a 2014 inspection, but it became readily apparent that the estimates provided by these records were not realistic. Basically, very little business (on-site production) had taken place in 2015, and yet the estimated emissions were challenging the limits of the PTI. The source of the apparent distortion in estimating styrene/VOC limits was not readily apparent, but UNITS and VOLUME of throughput, EMISSION FACTORS used (and associated units), and spreadsheet CALCULATIONS were all suspected possibilities. Time just ran out in the workday to resolve the issue on 4/25/16; and both SLachance and Mr. Fusee had independent avenues to explore as to the source of error in the available records.

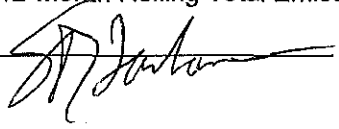
Back at respective offices, Mr. Fusee found that the spreadsheets were calculating VOC emissions based on mass balance principles as opposed to using the Unified Emission Factors for Open Molding of Composites. These emission factors (ATTACHED) were the basis for the development of the permit and are based on %VOC of materials, the application method for materials, and retention of much of the VOC/HAP within the finished part. Mr. Fusee started to modify facility records to properly incorporate these emission factors and calculations.

Meanwhile, back at the office, SLachance reviewed the PTI application materials and identified the same issue. Using the worst-case emission factor and assuming maximum %VOC allowed and the reported

Based on these efforts, SLachance believes that the facility is <u>in compliance</u> with the requirements of PTI No. 172-13 and MAERS for EI2015.

Attachments:

- Unified Emission Factors for Open Molding of Composites
- Monthly Records - per materials used, application methods and UEFs
- 12-Month Rolling Total Emissions (based on Monthly Records)

NAME  DATE 4/27/16 SUPERVISOR PAB