

Genesee, general

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

U25170917942775

FACILITY: Attentive Industries, Inc.		SRN / ID: U251709179
LOCATION: 502 Kelso Street, Flint		DISTRICT: Lansing
CITY: Flint		COUNTY: GENESEE
CONTACT: Tim Thompson , Operations Manager		ACTIVITY DATE: 12/18/2017
STAFF: Daniel McGeen	COMPLIANCE STATUS: Compliance	SOURCE CLASS: <i>MINOR</i>
SUBJECT: Multi-media inspection conducted with AQD, WRD, RRD, and WMRPD, and Flint WPC, to try to identify the origin of PFOS found in nearby Gilkey Creek.		
RESOLVED COMPLAINTS:		

On 12/18/2017, an unannounced, scheduled, multi-media inspection of Attentive Industries, Inc. was conducted by the Michigan Department of Environmental Quality (DEQ), Air Quality Division (AQD), Water resources Division (WRD), Waste Management & Radiological protection Division (WMRPD), and Remediation & Redevelopment Division (RRD), along with the City of Flint Water Pollution Control (WPC). The purpose was to try to identify the origin of detectable levels of perfluorooctane sulfonate (PFOS) found in nearby Gilkey Creek.

Perfluoroalkyl and polyfluoroalkyl substances (PFAS), such as PFOS, are part of a group of chemicals used globally during the past century in manufacturing, firefighting and thousands of common household and other consumer products. PFAS and PFOS are perfluorinated compounds (PFCs), and are emerging contaminants of concern.

**Environmental contact:**

Brian Lorde, Vice President; 810-233-7077

Tim Thompson, Operations Manager; 810-233-7077, *tim.thompson@attentiveindustries.com*

**Facility description:**

This facility primarily performs welded assemblies, resistant spot welding, and some metal stamping. Their customers are the aftermarket auto industry, per their website.

**Emission units:**

Metal hem presses; Rule 285(2)(l); compliance

Use of adhesive caulk: potentially exempt under Rule 287(2)(a) or (c)

Welding units: Rule 285(2)(i): compliance

**Regulatory overview:**

This facility is considered a *minor source of criteria pollutants*, that is, those pollutants for which a National Ambient Air Quality Standard (NAAQS) exist. These include carbon monoxide, nitrogen oxides, sulfur dioxide, volatile organic compounds (VOCs), lead, particulate matter smaller than 10 microns (PM10), and particulate matter smaller than 2.5 microns (PM2.5). A *major source* of criteria pollutants has the potential to emit (PTE) of 100 tons per year (TPY) or more of any one of the criteria pollutants, and would be subject to the Renewable Operating Permit program.

This facility is also considered to be a minor or *area source* for hazardous air Pollutants (HAPs), because it has a PTE of less than 10 TPY for any single HAP and less than 25 TPY for all HAPs combined.

Michigan Air Pollution Control Rule 201 requires a permit to install for a process which emits or may

emit an air contaminant. However, there are a number of exemption rules which may apply, provided the exemption criteria are met. These exemption rules are listed paired with the relevant equipment, under "Emission units", above.

I did not think to ask today if there were boilers onsite. Boilers would potentially be exempt from needing a PTI, under Rule 282(b). A natural gas-fired boiler which burns no other fuel at an area source of HAPs would not be subject to 40 CFR Part 63, Subpart JJJJJJ, National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial and Institutional Boilers, Area Sources, under Section 63.11195(e).

#### Fee status:

This facility is not considered a Category I fee-subject facility, because it is not a major source of criteria air pollutants. It is not considered a category II fee-subject source because it is neither a major source for hazardous air pollutants, nor is it subject to a federal New Source Performance Standard regulation. Lastly, it is not considered a Category III fee-subject facility, because it is not subject to a federal Maximum Achievable Control Technology standard. This facility is not required to submit an annual air emissions report via the Michigan Air Emissions Reporting System (MAERS), because it does not meet the criteria for reporting of having more than 10 TPY VOC emissions.

#### Location:

Attentive Industries has 4 plants at this site. They are located in an industrial park on the east side of Flint. Immediately west of the site is Gilkey Creek, which runs from south to north. The nearest residences are in a large residential neighborhood, about 800 feet west of the site, as measured in Google Map. The next closest residences are about 2,800 feet to the southeast. The rest of the surrounding area is a mix of commercial and industrial.

#### History:

It is my understanding that Attentive Industries began operating along Kelso Street in 2001, and gradually expanded to the present 4 plants.

#### Arrival:

Multiple DEQ staff met up in the Attentive Industry parking lot on 12/18/2017. We also met with Mr. Tom Hutchins of the City of Flint, from Flint Water Pollution Control (WPC). He is an industrial pretreatment program inspector. Government staff present were as follows:

- City of Flint, Water Pollution Control (WPC): Tom Hutchins
- DEQ, Water Resources Division (WRD): Carla Davidson, Charles Bennett, and Brian Zuber
- DEQ, Remediation & Redevelopment Division (RRD) staff: Paul Bucholtz and Jim Innes
- DEQ, Waste Management & Radiological Protection Division WMRPD): Bryan Grochowski and Nathan Hude
- DEQ, Air Quality Division (AQD): myself

Weather conditions were lightly raining and 40 degrees F, with winds out of the southwest at 10 miles per hour. No visible emissions were seen from the facility upon arrival, at 11:34 AM, just north of the corporate office building.

We entered the facility, and provided our identification/credentials, per DEQ procedure. We met with Mr. Brian Lorde, Vice-President, and Mr. Tim Thompson, Operations manager. DEQ staff explained the reason for our visit, to conduct inspections on behalf of the various government agencies we represented, and to try to identify the source(s) of the PFOS and PFAS present in Gilkey Creek.

#### Inspection:

One of the goals of this inspection was to determine if any plating was done at this site, as the overall plating industry nationwide has traditionally used fume suppressants, some of which may contain PFOS. We were informed that they do not do any plating, here. Rather, they contract it out to Mid State Plating nearby.

Although e-coating is mentioned on the Attentive Industries website, we were informed that this is outsourced to a facility in Sterling Heights. Powder coating is also done offsite, we were advised. Their metal stamping is done in Detroit, we were told.

**Metal hem presses; Rule 285(2)(i):**

We were shown a number of metal presses in the plants. These are not stamping presses, but rather are hem presses, and are used to press two parts together for assembly. These appear to be exempt from needing a permit to install. There were no visible emissions observed from the presses.

The hem presses appear to meet the criteria for the Rule 285(2)(l)(i) exemption, which applies to:

(l) The following equipment and any exhaust system or collector exclusively serving the equipment:

(i) Equipment used exclusively for bending, forming, expanding, rolling, forging, pressing, drawing, stamping, spinning, or extruding either hot or cold metals.

We observed rolling and flattening processes in Building 4, which roll and flatten metal. They also appear to qualify for the Rule 285(2)(l)(i) exemption, above.

**Adhesive application by hand held applicators; potentially Rule 287 exempt:**

In the assembly area of one plant, we were shown how caulk guns fed by a hose are used to apply a sealer material and an anti-flutter material to steel parts, which were then assembled. We were informed that if those had been aluminum parts, a different sealer and a different anti-flutter material would have been used. There appeared to be a number of different stations where employees apply these materials. The exact usage rate of the sealers and anti-flutter compounds was not known, off-hand, when I inquired. I did not see any visible emissions from these processes, which exhausted into the general, in-plant environment.

It is possible that each individual caulking station may be able to qualify for an exemption from the requirement to obtain a permit to install, under either Rule 287 (a) or (c). The Rule 287(a) and (c) exemption criteria are listed below:

(a) An adhesive coating line which has an application rate of less than 2 gallons per day and which has emissions that are released only into the general in-plant environment.

(c) A surface coating line if all of the following conditions are met:

(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.

(ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.

(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

**Miscellaneous:**

They have a Power Vibe cleaner 288-B unit used for tumbling parts to remove imperfections. The unit

has a cardboard lid. Metal parts finishing like this which exhausts into the general, in-plant environment is considered exempt from needing a permit to install under Rule 285(2)(I)(vi)(B). This rule exempts the following:

(I) The following equipment and any exhaust system or collector exclusively serving the equipment:

(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(A) Equipment used on a nonproduction basis.

(B) Equipment that has emissions that are released only into the general in-plant environment. (Emphasis added).

(C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

**There was a tool room onsite, and also a shop/repair room. These areas had metal machining processes which appear exempt from needing a permit to install under Rule 285(2)(I)(vi)(A), or the previously discussed Rule 285(2)(I)(vi)(B), above. Rule 285(1)(vi)(A) exempts the following:**

(I) The following equipment and any exhaust system or collector exclusively serving the equipment:

(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(A) Equipment used on a nonproduction basis. (Emphasis added.)

(B) Equipment that has emissions that are released only into the general in-plant environment.

(C) Equipment that has externally vented emissions controlled by an appropriately designed and operated fabric filter collector that, for all specified operations with metal, is preceded by a mechanical precleaner.

**Welding units: Rule 285(2)(i):**

**We observed spot welding units, including a robot line, in Building 1. Rule 285(2)(i) exempts:**

(i) Brazing, soldering, welding, or plasma coating equipment.

**Conclusion:**

No air violations were identified at the time of the inspection. AQD will send a Rule 278a letter to the company, requesting that they demonstrate in writing that they are exempt from Rule 201, regarding the use of anti-sealer and anti-flutter materials in caulking stations. Each station could potentially use Rule 287(2)(a) or (c), or Rules 290 or 291.

**Note: WRD and RRD inspections and sampling found that Attentive Industries does not appear to be a source of PFOS contamination. Please refer to WRD and RRD files for further details.**

NAME



DATE

9/30/2018

SUPERVISOR

