



Environmental Resources Group

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MAR 28 2018

AIR QUALITY DIVISION
GRAND RAPIDS DISTRICT

March 21, 2018

Mr. Chris Robinson, MDEQ – AQD
Grand Rapids District Office
350 Ottawa Avenue, NW, Unit 10
Grand Rapids, MI 49503

**RE: Response to the Violation Notice (SRN: A4227, Muskegon County)
VOC and HAP Calculations for Former American Grease Stick Company
2651 Hoyt Street, Muskegon, MI**

Dear Mr. Robinson:

On behalf of AGS Company Automotive Solutions, LLC (AGS), Environmental Resources Group, LLC (ERG) is pleased to respond to your email on March 14, 2018 requesting additional information that you requested by upon review ERG's initial submittal.

Facility-wide PTE

Our previous Potential to Emit (PTE) submittal has been revised to include all possible emission units, facility-wide, for the following manufacturing lines and equipment (see Attachment A):

- Compounding Area,
- Oden Line,
- Brake Line Manufacturing,
- Gallon Line (not existing)
- Tank Farm,
- Cold cleaner,
- Boilers, and
- Printers.

Manufacturing lines: Mixing and/or compounding of raw material are performed in Compounding Area. Some compounding tanks are completely enclosed/sealed, and no VOCs are emitted. VOCs in raw products generally go through a chemical process and are incorporated into the final products. Additional details for specific manufacturing lines is provided below:

- The Oden line is only used for packaging and filling of products, including Lock Ease which is compounded in a completely enclosed tank. The finished product is pumped to the filling station on the line for bottling. The Oden is a machine that fills a plastic bottle or pouch and then caps or seals the retail-sized vessel. Fluids are pumped into bottles ranging in capacity from 3.5 oz. to 1 gallon.
- The Brake Line Manufacturing does not generate any emissions. The brake line manufacturing portion of the plant does not use any products that contain VOCs or HAPs either.

- The Gallon Line is no longer used and thus doesn't contribute any VOCs or HAPs that may need permitted. AGS has been disassembling and removing the Gallon Line, which was installed prior to 1967, and all work is scheduled to be completed by March 30th.

ERG calculated the PTE (uncontrolled) for VOC and HAPs for each potential emission unit while operating continuously at the maximum operating capacity (i.e., 8,760 hours per year). As shown in Attachment A the facility wide PTE for VOCs and HAPs is 47.50 tons/year and 2.32 tons/year, respectively. ERG's assumptions used during the PTE calculations are included in Attachment A, with additional supporting data included in subsequent attachments, as follows:

1. Attachment C – Tank Emissions
2. Attachment D – Tank Vapor Pressures, and
3. Attachment E – Emission Calculations for Boilers.

Conclusion

ERG's review of the VOC and HAP emissions from all possible emission source areas shows the facility-wide PTEs for VOC and HAPs are below major source thresholds. All equipment currently used at AGS can receive exemption from permitting per one or more of Rule 336.1278-1290.

If you have technical questions about this response letter, please contact us at (248) 773-7986.

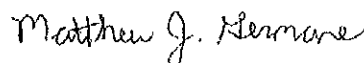
Please contact AGS's Jamie Ardis, Associate Product Manager at 800-253-0403, extension 3400 or John Sanocki, Director of Operations, at 800-253-0403, ext. 3342, for site-specific questions.

Sincerely,

ENVIRONMENTAL RESOURCES GROUP, LLC



Mala C. Hettiarachchi, PhD, PE
Senior Environmental Engineer



Matthew J. Germane, PE
Senior Project Manager

MH/mjg

Enclosures: Attachment A – Facility wide PTE
Attachment C – Tank emissions
Attachment D – Vapor pressures
Attachment E – Emission Calculations for Boilers.

Cc: Jamie Ardis, AGS
John Sanocki, AGS