

M4852
MAVIA

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

M485252527

FACILITY: CREST INDUSTRIES		SRN / ID: M4852
LOCATION: 1337 KING, TRENTON		DISTRICT: Detroit
CITY: TRENTON		COUNTY: WAYNE
CONTACT: Norm Wheeler , Chemist		ACTIVITY DATE: 02/20/2020
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : February 20, 2020
 TIME OF INSPECTION : 1:15 pm
 NAICS CODE : 325520
 EPA POLLUTANT CLASS : VOC
 INSPECTED BY : Jill Zimmerman
 PERSONNEL PRESENT : Norm Wheeler, Chemist
 Mike Schlaff, Operations Manager
 FACILITY PHONE NUMBER : 734-479-4141

FACILITY BACKGROUND

Crest Industries batch blends various chemicals to produce automotive sealants, adhesives and caulks. Crest supplies products to automotive dealerships, body shops and other industrial accounts. The facility operates one shift per day, five days per week.

Crest originally operated in Wyandotte and moved to this location in 2000. All equipment was relocated to the Trenton location, and the facility was issued permit 188-00 to cover all equipment located at the Trenton location, which includes seven mixers and a packaging line.

REQUIRED PPE

Steel toed shoes and safety glasses were worn during the onsite inspection. No other safety equipment was required during the onsite inspection.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility. No violations have been issued to this facility.

PROCESS EQUIPMENT AND CONTROLS

All chemicals are mixed in vessels as part of a batch process. All mixing and packaging take place in the mixing room and all vessels vent directly to the general room air.

INSPECTION NARRATIVE

I arrived at the facility at 1:15 pm. Upon entering the facility, I met with Norm Wheeler, chemist, and Mike Schlaff, Operations Manager, to discuss the purpose of my inspection. The front of the building is office space. Much of the building is warehouse space including storage space for raw materials and finished product. The mixing room is where products are blended in a batch process to form automotive sealants, adhesives, and caulks is in the southeast corner of the building. Some products are produced offsite and packaged at this location.

During the onsite inspection, no batch blending was being performed. Mr. Wheeler and Mr.

Schlaff explained the mixing process. No mixing was occurring during the onsite inspection, though two employees were manually labeling product. He explained that all the mixers listed in the permit are still located at the facility, though one is no longer used. Mixers are used on an as needed basis, typically once every two to six months, depending on the product. EUMIXER4 and EUMIXER 5 are non-dedicated mixers attached to 250-gallon covered totes or 55-gallon covered drums. Production at the Trenton location is down significantly because a lot of the products are made offsite as the demand of the business has changed to faster curing products.

APPLICABLE RULES/PERMIT CONDITIONS

Crest Industries is currently operating under PTI 188-00, which was issued on December 20, 2001. This permit covers seven mixers of varying sizes, and a repacking and relabeling operations. All the mixers are permitted under flexible group FGMIXERS. There is also a flexible group which covered the entire process, FGPROCESS. The special conditions are as follows:

EUPACK

1.1 Compliance – Based on records received from the facility, the VOC emissions from this emission unit was 0.023 TPY in 2018 and 0.019 TPY in 2019. These values are significantly less than the permit limit of 0.1 TPY. A copy of these records is attached to this report.

1.2 Compliance – The facility highest usage month in 2019 was March when 14,058 pounds of material were processed. The highest usage month in 2018 was May when 15,128 pounds of material were processed. This is less than the permitted limit of 48,000 pounds of material processed per month. A copy of these records is attached to this report.

FGMIXERS

2.1 Compliance – The VOC limit for this emission unit is 4.6 TPY, based on a 12-month rolling average. During 2018, this emission group emitted 0.42 TPY VOC and during 2019 this emission group emitted 0.42 TPY VOC. These values are less than the permitted limit. A copy of these records is attached to this report.

2.2a Compliance – The permitted limit for all material throughput is 56,700 pounds per calendar month. Based on the received records, the highest monthly throughput for 2018 was 5,090 pounds during the month of November, and the highest monthly throughput for 2019 was 4,869 during the month of April. These values are less than the permitted limit. A copy of these records is attached to this report.

2.2b Compliance – The permitted limit for total organic liquids throughput is 22,400 pounds per calendar month. Based on the received records, the highest monthly throughput for 2018 was 795 pounds during the month of November, and the highest monthly throughput for 2019 was 797 during the month of July. These values are less than the permitted limit. A copy of these records is attached to this report.

2.2c Compliance – The permitted limit for total weight toluene throughput is 1,200 pounds per calendar day. During 2018 the facility processed 450 pounds of toluene during a calendar day in the months of March, July, and November. During 2019 the facility processed 450 pounds of toluene during a calendar day in the months of March and August. This is less than the permitted limit. A copy of these records is attached to this report.

2.2d Compliance – The permitted limit for total Hexsolv throughput is 650 pounds per calendar day. During 2018, 91 pounds of Hexsolv was used during a calendar day in March. No Hexsolv has been used since this date. This is less than the permitted

limit. A copy of these records is attached to this report.

2.2e Compliance – The permitted limit for isopropyl alcohol throughput is 650 pounds per calendar day. Based on the received records, no isopropyl alcohol has been used during 2018 and 2019.

2.3 Compliance – During the onsite inspection, the mixers were not being used. The surface area calculations for the surface area of the mixers is less than the permitted limits. A copy of these calculations is attached to this report.

2.4 Compliance – The calculations for the area of the interface between the mixer and the shaft was reviewed during the onsite inspection and appears to be in compliance with the required ratio. A copy of these calculations is attached to this report.

FGPROCESS

3.1 Compliance – During 2018, this emission unit emitted 0.006 TPY VOC and during 2019, this emission unit emitted 0.005 TPY VOC. The permit limit for this emission unit is 0.26 TPY VOC. The reported emissions are less than the permitted limit, showing compliance with this condition.

3.2 Compliance – The facility is limited to processing less than 32,300 pounds of solid material per calendar month. During November 2018 the facility processed 1,852 pounds of material and during March 2019, the facility processed 1,902 pounds of material (the highest reported monthly value per year).

3.3 Compliance – The facility maintains records for the chemicals processed on a monthly and daily basis as well as the number of batches processed each day and the mass of materials in each batch. The monthly records are attached to this report for both 2018 and 2019. The daily records were sent to me electronically but are too large to attach to this report.

MAERS REPORT REVIEW

The permit sites Rule 205 (3) in the special conditions, requiring the facility to submit MAERS. MAERS for 2018 reporting year was submitted March 8, 2019. All emissions appear to have been reported accurately and are supported by attached records. During the onsite inspection, Mr. Wheeler explained that he was planning to submit MAERS for 2019 reporting year.

FINAL COMPLIANCE DETERMINATION

Crest Industries appears to be operating in compliance with all state and federal regulations as well as all the evaluated permit conditions.

NAME Joe Zimmerman DATE 2/25/2020 SUPERVISOR JK