

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

N144338156

FACILITY: Palmer Promotional Products	SRN / ID: N1443
LOCATION: 33525 Groesbeck Hwy., FRASER	DISTRICT: Southeast Michigan
CITY: FRASER	COUNTY: MACOMB
CONTACT: Al Vespa , Director of Manufacturing and Engineering	ACTIVITY DATE: 12/15/2016
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance
SUBJECT: Inspection and compliance determination.	SOURCE CLASS: SM OPT OUT
RESOLVED COMPLAINTS:	

Background

Palmer Promotional Products (Palmer) SRN: N1443 is promotional display manufacturing facility located at 33525 Groesbeck Hwy, Fraser, MI 48026. Palmer is located in a primarily light industrial area with the nearest residential structures approximately 1700 feet east and west of the facility. The facility was inspected on Thursday December 15, 2016 by Tyler Salamasick, Environmental Quality Analyst of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspection was to determine the facility's compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. Palmer currently holds permit No 125-16. The site contact is the Director of Manufacturing and Engineering, Al Vespa. Palmer has approximately 100 employees and operates Monday through Friday from 7:30am until 4:15pm.

Inspection

Site arrival was at 9:50 am, Thursday December 15, 2016. I met the Director of Manufacturing and Engineering, Al Vespa. Upon meeting I presented my State of Michigan identification card, informed the facility representative of the intent of my inspection and was permitted onto the site. Al informed me that the facility manufactures and assembles various promotional products. These products include but are not limited to: plastic bar accessories, menu boards, store displays and cabinets. Most of the production is high volume assembly. Palmer's permit to install 125-16 covers one adhesive line and three spray booths. During the inspection, Al showed me the three spray booths and the adhesive line. One of the booths had been recently installed and had not been used yet. Only one of the booths was being used while I was at the facility. Al informed me that they normally only used one booth, but had the other two incase demand increased. The adhesive line was also not being used during my inspection. Al informed me that they currently use the adhesive line approximately once every ten days.

PTI 125-16 Conditions

FG- Display-

Description: Water based laminate adhesive line with in-plant emissions and 3 adhesive spray booths, each vented outside. Purge and cleanup operation associated with each line is included. Particulate from the booths are controlled by dry filters.

I. EMISSION LIMITS

The permit limits VOC emissions to 7.3 tpy per a 12-month rolling time period as determined at the end of each calendar month . This is monitored as specified by SC VI.2, SC VI.3 with R 336.1702(a) as the underlying applicable requirement. At the time of my inspection the facility had kept track of the past 2 months and some of December (the permit was issued on August 30th). The records indicated that the facility's current emissions were at 0.604 tons. This number only accounts for three months and a full 12 month rolling limit will have to be determined at a later date.

II. MATERIAL LIMITS

1. VOC content of adhesive material 0.9 lb/gal (minus water) as applied by EU-AdhesiveLine. This is monitored

as specified by SC V.1, SC VI.2 with R 336.1702(a) as the underlying applicable requirement. Palmer uses the manufacturer specifications to ensure compliance with this condition of the permit. The SDS indicates that the material is water based low VOC product.

2. VOC content of adhesive cement spray material 4.95 lb/gal (minus water)a as applied EU-CementSB-01, EU-CementSB-02, EU-CementSB-03. This is monitored as specified by SC V.1, SC VI.2 with R 336.1702(a) as the underlying applicable requirement. The SDS for F-155R, F-156 indicate the VOC content minus water is 4.94882 pounds per gallon. This material appears to be compliant with the material limit.

III. PROCESS/OPERATIONAL RESTRICTIONS

1. The permittee shall capture all waste coatings, adhesives, cements, purge and cleanup solvents (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. **(R 336.1702(a))**. I did not observe any waste coatings exposed to the open air. The containers in the area were closed and stored in a cabinet behind the paint booth. Al informed me that they only need to clean the tips of the spray guns, which allows them to minimize the use of solvents.

2. The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. **(R 336.1224, R 336.1370)**. Al informed me that the filters are sealed in garbage bags and removed. I did not visually confirm this.

3. The permittee shall handle all VOC containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. **(R 336.1225, R 336.1702(a))** Palmer's adhesive coating was stored in a sealed 55 gallon drum. The container appeared to be in good condition. I did not detect any VOC odors in the painting area. Palmer appears to meet this requirement of the permit.

IV. DESIGN/EQUIPMENT PARAMETERS

1. The permittee shall not operate each adhesive spray booth portion of FG-DisplayFixture unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner. **(R 336.1224, R 336.1301, R 336.1910)**. Palmer's booths are equipped with a built in lock-out system that prevents the spray guns from operating unless the booths intake system is running. At the time of my inspection the filters appear to be in good condition. I did not observe gaps in the filter system that would allow for the uncontrolled emission of particulates. This appears to meet this condition of the permit.

2. The permittee shall equip and maintain each adhesive spray booth portion of FG-DisplayFixture with HVLP applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. **(R 336.1702(a))**. The facility uses HVLP spray guns at each of its three booths. Al informed me that the facility has not yet used pressure testing caps on the guns, but the equipment does have a pressure gauge attached to the adhesive drum that will release pressure if it gets too high.

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. **(R 336.1702, R 336.2001, R 336.2003, R 336.2004, R 336.2040(5))**. Palmer currently uses the manufacturer's formulation to determine the VOC content. AQD staff informed Mr. Vespa that Palmer Promotion Products must request written approval from the AQD District Supervisor to use the manufacturer's formulation data.

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**. At the time of my inspection Palmer promotional products had not had its permit in excess of 5 years. The facility has the records from the date the permit was issued.

1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. **(R 336.1702)**. Palmer appears to meet this condition.
2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. AI had a copy of the SDSs in his office during the inspection and provided an electronic copy to the MDEQ.
3. The permittee shall keep the following information on a calendar month basis for FG-DisplayFixture:
 - a) Gallons (with water) of each VOC containing material used and reclaimed (if applicable).
 - b) VOC content (with water) of each material as applied.
 - c) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
 - d) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

Palmer's records appear to be compliant with these conditions of the permit.

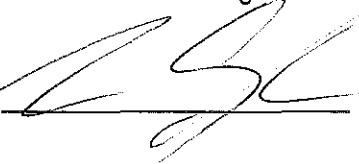
The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. **(R 336.1702(a))**. Palmer calculates the VOC emissions based on the assumption that the total VOC content is emitted from the material. This is the most conservative approach and appears to meet the permit condition.

VII. REPORTING

1. Within 30 days after completion of the installation, construction, reconstruction, relocation, or modification authorized by this Permit to Install, the permittee or the authorized agent pursuant to Rule 204, shall notify the AQD District Supervisor, in writing, of the completion of the activity. Completion of the installation, construction, reconstruction, relocation, or modification is considered to occur not later than commencement of trial operation of EU-CementSB-03 portion of FG-DisplayFixture. **(R 336.1201(7)(a))**. Palmer had the equipment installed at the time of the inspection. All of the permitted equipment is installed and operational. On 1/12/2016 I informed AI that he must submit, in writing, a statement informing the AQD that the equipment has been installed.

Conclusion

It appears that Palmer is in compliance with permit No. 125-16 as well as the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. Palmer Promotional Products must submit a report stating they have installed EU-CememntSB-03 and a request to use the manufacturer specifications for material content of the adhesives. AQD staff will have to determine compliance with the 12 month rolling emission rate once Palmer has been recording data for at least 12 months.

NAME  DATE 1/12/17 SUPERVISOR 