

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N175463271

FACILITY: Cadillac Products Automotive Co.		SRN / ID: N1754
LOCATION: 4858 Williams Road, ROGERS CITY		DISTRICT: Gaylord
CITY: ROGERS CITY		COUNTY: PRESQUE ISLE
CONTACT: Bryan Hall , Extrusion Manager		ACTIVITY DATE: 06/21/2022
STAFF: David Bowman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection of facility, reviewed additional records provided at the inspection		
RESOLVED COMPLAINTS:		

On 6-21-2022, I David Bowman, (SOM EGLE AQD), accompanied by Sharon Leblanc, (SOM EGLE AQD), Becky Radulski, (SOM EGLE AQD), conducted a scheduled site inspection of N1754, Cadillac Products Automotive Company, 4858 Williams Rd, Roger City, MI. The Facility is operating under PTI 48-00. The source is found by traveling south of Rogers City on US 23 for approximately 5 ½ miles then turn East on Williams Rd. Source is visible from US 23.

The temperature was 80 °F, with high humidity, and light breezes from the south.

FACILITY

Viewing the building from the parking lot (south side) the Regenerative Thermal Oxidizer (RTO) and stack are located outside of the building on the south side. The RTO was not operating, so no visible emissions were coming from the stack. There appears to be an additional stack on top of a square structure extending above the roofline that in fact not a stack, but a process tower that is described later in this report. On the south side of the building are several large silos that contain the resin used in the processes in the plant. They are capped and pipe the resin into the process lines.

We entered through the main entry way, located on the western side of the building, and signed in. We were met by Bryan Hall, Materials Manager, who provided records and a tour of the facility.

Cadillac Products Automotive Company makes the plastic seals that are placed between the metal door frame and the plastic door panel for cars and trucks. There are two processes that are used at the facility. The permitted process (and the one used the least) is the Flexographic Printing Press, and was reported by Mr. Hall to be used approximately 4 times per year. This was supported by records provided during the records review and the MAERS review conducted prior to the onsite inspection. More information about those reviews can be found in MACES.

The other process places a calk like bead around the insert and is what the company is moving its production to which has led to the flexographic printing being used less and less. All the lines at the source were plainly labeled and readily identifiable (PTI 48-00 SC 13).

COMPLIANCE

We then went to inspect the Flexographic Printing Press Unit #242 (EU00001 and FGFLEXOGRAPIC). It is labeled on the control panel. The original PTI stated two Flexographic Printing Presses, Flexographic Printing Press Unit #276 (EU00002) was removed 7/19/2021. It is reflected in MAERS that the EU has been removed. When in use the usage calculation is based

upon use of a full barrel of adhesive to minimize the waste and maximize the use of RTO. The oven on the Flexographic Printing Press emits directly to the RTO.

The RTO is operated at 1500 °F with alarms, both visual and audible, that tell operators if there is a malfunction. If the temperature begins to drop from 1500 °F an amber light is activated in the area that the operators work. If the temp drops below 1400 °F then a red light activates and the audible alarm sounds signaling for the operator to shut down FGFLEXOGRAPIC until the issue can be identified and corrected. The RTO is a two bed RTO that is controlled by PLC. The RTO emits to a vertical stack that from ground level appears to be a minimum of 40" diameter and at least 30' tall (PTI 48-00 SC 1 and SC 12). They have not had any major repairs to the RTO. The only repair completed was to the door seals on the diverter door.

On July 10, 2001, The destruction efficiency (DE) was tested and confirmed at 99.04%. The capture efficiency (CE) was confirmed at 95.2% on July 14, 2003 as required by PTI 48-00 SC 6. The RTO temp is monitored in real time by a digital readout and recorded during all periods of operation on a paper record disk. I reviewed the April 2022 and May 2022 disks (PTI 48-00 SC 7) and showed compliance with permit limits.

When the run is complete any remaining ink, adhesive, etc is weighed and returned to a covered and controlled storage room. I reviewed the records for April 2022 and May 2022 and this was the practice indicated by the operator check sheet. (PTI 48-00 SC 10)

The source utilizes an online record system for all the current chemical composition of each material. Records review for April 2022 and May 2022 support that the chemical composition is recorded and used for the computations based upon material usage. Facility staff weigh out materials for process use and then weigh in for return of any unused material. (PTI 48-00 SC 9 and SC 11)

The material storage locker is a controlled access room. Each container of materials was covered at time of inspection. The room was clean and had odors of solvent present, but that could not be detected outside of the room.

The apparent second stack (seen from the parking lot and noted earlier in this report) is actually a tower extending above the roof line that is used to create a tube of plastic sheeting. Plastic beads are heated and extruded (R 286 (2)(a)) the tube then has a cold air blown into it to create a tube of plastic sheeting then returned back to a roll at the ground level of the facility. I was able to look directly up into the "stack" and it was not a stack in the terms used by AQD for emissions. There is a second extrusion line (R 286 (2)(a)) used to create single thickness sheets of plastic. That line does not utilize a tower.

All the waste plastics are collected and processed by the recycle line that melts and extrudes the material creating plastic beads for use in the process again. The source reuses, to the maximum ability, minimizing all waste products at the site.

SUMMARY

Based on documentation reviewed, reporting submitted, and information obtained as part of the onsite inspection, the Facility appears to be in general compliance with permit conditions.

NAME _____

DATE _____

SUPERVISOR _____