

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

N186424657

<b>FACILITY:</b> NORON COMPOSITE TECHNOLOGIES, INC		<b>SRN / ID:</b> N1864
<b>LOCATION:</b> 650 W. Hoague Rd., GRANT TWP		<b>DISTRICT:</b> Cadillac
<b>CITY:</b> GRANT TWP		<b>COUNTY:</b> MASON
<b>CONTACT:</b> Ron Melchert Sr , President		<b>ACTIVITY DATE:</b> 03/11/2014
<b>STAFF:</b> Kurt Childs	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> 2014 FCE, site inspection, records and reporting review.		
<b>RESOLVED COMPLAINTS:</b>		

**2014 Full Compliance Evaluation including site inspection and records/reporting review.**

On 3/11/14 I met with Mr. Ron Melchert at Noron Composites and conducted an inspection of the facility to determine compliance with MI-ROP-N1864-2011, the Air Pollution Control Rules, and 40 CFR Part 63, Subpart WWWW (Reinforced Plastic Composites Production). Mr. Melchert informed me that a large section of the building had recently collapsed under snow load. That portion of the building has been sealed off, the debris removed and work activities relocated. Noron plans to reconstruct the damaged portion of the building which is on the west side.

The lamination and gel coat booth areas of the plant have been upgraded with drywall, doors and sprinkler systems for fire code. There have not been any changes to the ventilation system except that one area that used to be one large booth has been divided into 2 smaller booths which are both served by the same exhaust system. There have not been any changes to application methods for resin and gel coat. The booth where the EUFOAM process was located has been removed (as well as stack SVStack#7) and Foam operations are now conducted using portable equipment in one of the available gel coat booths.

A new roto-casting process has been installed that produces artificial landscape rock or boulders. The process consists of a device that holds a mold in a manner that allows it to be spun on two axis. The resin or gel coat is poured from containers into the mold which is then closed and spun on the roto-casting device to evenly distribute the material within the closed mold. Resin and gel coat usage for this process are tracked along with usage for the rest of the plant. This process does not appear to meet the definitions of centrifugal casting or polymer casting in Subpart WWWW and is most likely closed molding which is not subject to any requirements under the subpart.

**EUFOAM**

I.1 VOC emission limit 0.4 tons/12mos. rolling time period; Only 50 pounds of foam were used during the most recent 12 mos. rolling time period VOC emissions were 0.03 lbs.

VII. 1, 2,3. Deviation, semiannual, and annual reporting; Reporting of deviations has not been necessary over the past 12 months, Semiannual and annual ROP reporting has been submitted in a timely manner and with proper certification.

**EULAMINATION**

I.1 VOC emission limit 11.1 tons/12 mos. rolling; VOC emissions from resin usage for the most recent 12 mos. rolling time period were 3,071.38 lbs.

II.1 VOC content-production resins 34%; Production resin VOC content was 33%.

II.2 VOC content-tooling resins 50%; Some individual tooling resins exceed 50% styrene but the weighted average for tooling resins is less than 50% (48.5% for 2/13 -1/14) because much more of the 47% resin is used than 53% resin.

III.1 Waste materials stored in closed containers and disposed of properly; At the time of the inspection all containers I observed were maintained closed when not in use.

IV.1 Permittee may not operate booths unless exhaust filters are installed; Each of the booths I observed had properly installed filters in good condition.

IV.2. Resin application equipment must be non-atomized or equivalent; Non-atomized applicators are used.

VI.2 VOC content records for each shipment of production and tooling resins; Noron receives certificates of analysis with each shipment of material (see attached records) some of which contain VOC/HAP content data. The COA's for other materials do not contain VOC content data. Noron is currently using VOC content data from safety data sheets (SDS) to demonstrate compliance with the material limits in section II and also to demonstrate compliance with the Plastic Composites MACT. Through a series of email and phone contacts Noron has

updated the recordkeeping to utilize current worst case SDS data in the calculations. These records verify that the resin VOC/HAP contents are in compliance with the material limits.

VI.3. Monthly records for emission calculations. The required records including identity and amount of resin used, VOC content, emission factor, emission calculations are maintained and are now current.

VII. 1,2,3. Deviation, semiannual, and annual reporting; Reporting of deviations has not been necessary over the past 12 months, Semiannual and annual ROP reporting has been submitted in a timely manner and with proper certification.

VIII. Stack/vent restrictions; no changes to stack parameters.

**EUGELCOAT**

I.1. VOC emission limit 18 tons/ 12 mos. rolling; VOC emissions (styrene and MMA) from resin usage for the most recent 12 mos. rolling time period were 5149.78 lbs.

II.VOC content limits for each gelcoat.

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
Clear Gelcoats	48% VOC <sup>2</sup> 48% Styrene Monomer <sup>2</sup>	Maximum content by weight.	EUGELCOAT	VI.2	R 336.1225, R 336.1702(a)
White Gelcoats	36% VOC <sup>2</sup> 31% Styrene Monomer <sup>2</sup>	Maximum content by weight.	EUGELCOAT	VI.2	R 336.1225, R 336.1702(a)
Color Gelcoats (non-white)	45% VOC <sup>2</sup> 40% Styrene Monomer <sup>2</sup>	Maximum content by weight.	EUGELCOAT	VI.2	R 336.1225, R 336.1702(a)
Tooling Gelcoats	48% VOC <sup>2</sup> 43% Styrene Monomer <sup>2</sup>	Maximum content by weight.	EUGELCOAT	VI.2	R 336.1225, R 336.1702(a)
All Gelcoats	10% MMA Monomer <sup>2</sup>	Maximum content by weight	EUGELCOAT	VI.2	R 336.1225, R 336.1702(a)

Review of the required records indicates that styrene and MMA contents of the gelcoats did not exceed the above material limits.

III.1 Waste materials stored in closed containers and disposed of properly; At the time of the inspection all containers I observed were maintained closed when not in use.

IV.1 Permittee may not operate booths unless exhaust filters are installed; Each of the booths I observed had properly installed filters in good condition.

VI.2 VOC content records for each shipment of production and tooling resins; Noron receives certificates of analysis with each shipment of material (see attached records) which should contain VOC/HAP content data. This data is used in developing the emission factors used to demonstrate compliance with the emission limits. The records I obtained indicate some COAs do not contain the VOC/HAP content information and others indicated slightly higher VOC contents than were used in the emission calculations for 2013. VOC contents can vary within a set range for each shipment. Additional information was requested and received on March 19, 2014, after reviewing this data additional information was still required. This information was received on April 14<sup>th</sup>, 2014, these records verify that the resin VOC/HAP contents are in compliance with the material limits using the maximum VOC content from the SDS, which is higher than the individual COA results I reviewed.

VI.3. Monthly records for emission calculations. The required records including identity and amount of gelcoat used, styrene and MMA content, emission factor, emission calculations are maintained.

VII. 1,2,3. Deviation, semiannual, and annual reporting; Reporting of deviations has not been necessary over the past 12 months, Semiannual and annual ROP reporting has been submitted in a timely manner and with proper certification.

VIII. Stack/vent restrictions; no changes to stack parameters.

**EUMISCMATERIALS**

I.1. VOC emission limit 6.3 Tons per 12 mos. rolling time period; Review of the required records indicates VOC emissions for the most recent 12 mos. rolling time period were 1,681.25lbs.

VI.2. Monthly records for emission calculations. The required records including identity and amount of miscellaneous materials used, VOC content, emission factor, emission calculations are maintained.

VII. 1,2,3. Deviation, semiannual, and annual reporting; Reporting of deviations has not been necessary over the past 12 months, Semiannual and annual ROP reporting has been submitted in a timely manner and with proper certification.

VIII. Stack/vent restrictions; no changes to stack parameters.

#### **EUCLEANUP**

I.1. Acetone emission limit 30 tons/12 mos. rolling time period; Review of the required records indicates acetone emissions for the most recent 12 mos. rolling time period were 6.43 tons.

III.1 Waste acetone stored in closed containers and disposed of properly; At the time of the inspection all containers I observed were maintained closed when not in use.

VI.2. Monthly records for emission calculations. The required records including the amount of acetone used and emission calculations are maintained.

VII. 1,2,3. Deviation, semiannual, and annual reporting; Reporting of deviations has not been necessary over the past 12 months, Semiannual and annual ROP reporting has been submitted in a timely manner and with proper certification.

VIII. Stack/vent restrictions; no changes to stack parameters.

#### **FGMACT**

I. Emission limits; Noron Composites demonstrates compliance with Subpart WWWW emission limits for gelcoats using the weighted average option(63.5810(c)). Compliance for resins is demonstrated using the HAP content limit option (63.5810(d)). Records of material HAP contents and usage are maintained each month as well as emission calculations (see attached records). Certificates of analysis are available for some gel coats and resins but data from the SDS is used for the emission calculations which is acceptable per 63.5895(c). The records indicate compliance with the applicable emission limits.

III.1. Permittee may not use cleaning solvents containing HAP. Noron uses Acetone as the cleaning solvent.

VI.2. emission limit compliance demonstration; Records are maintained as described above in I.

VI.3. Work Practice Standards; Noron Composites is in compliance with the work practice standards in Table 4 which include not using cleaning solvents that contain HAP (acetone is used) and maintaining HAP containing material containers closed.

VI.4. Material use records; Noron Composites is maintaining the necessary records to determine compliance as required (see attached records).

VI.6. Demonstrate continuous compliance with emission limit and work practice standards; Demonstration of continuous compliance is through maintenance of monthly 12-month rolling time period records of emissions compliance and by performing the applicable work practices.


VII. 1,2,3. Deviation, semiannual, and annual reporting; Reporting of deviations has not been necessary over the past 12 months, Semiannual and annual ROP reporting has been submitted in a timely manner and with proper certification.

VII.4 Semiannual compliance report; Subpart WWWW semiannual compliance reports have been submitted in a timely manner and have indicated compliance with the MACT standard.

#### **MAERS**

Noron has submitted the 2013 MAERS report which has been reviewed and approved.

As a result of this FCE it appears Noron is in compliance with MI-ROP-N1864-2011 at this time.

NAME  DATE 4-14-11 SUPERVISOR 