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

N186446011

FACILITY: NORON COMPOSITE TECHNOLOGIES, INC		**SRN / ID:** N1864
LOCATION: 650 Hoague Rd., GRANT TWP		**DISTRICT:** Cadillac
CITY: GRANT TWP		**COUNTY:** MASON
CONTACT: Ron Melchert Sr , President		**ACTIVITY DATE:** 08/17/2018
STAFF: Chance Collins	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled Inspection for Full Compliance Evaluation		
RESOLVED COMPLAINTS:		

On August 17, 2018 AQD staff traveled to Mason County to perform an inspection of Noron Composite Tec Inc. The purpose of the inspection was to determine the facility's compliance with MI-ROP-N1864-2016 an applicable state and federal air pollution control regulation 40 CFR Part 63, Subpart WWWW. AQD staff no the facility consists of three dry filter spray booths used for resin application process, three dry filter spra used for application of gelcoat materials, and containers of solvent materials.

Noron Composite Technologies, Inc manufactures laminated fiberglass product parts primarily for the hea and food service industries. They also produce parts for the boat manufacturing industry and clients in th automobile industry. Parts are constructed in molds from sprayed gelcoat, fabric and chopped fiberglass, manually applied resin. There are other associated processes such as material cutting, solvent clean-up, grinding, and finishing that also occur on-site.

AQD staff arrived on site at 10:32 a.m. to overcast conditions with a temperature of 74°F and a NE wind of There were no noticeable odors upon arrival.

AQD staff met with Mr. Ron Melchert Sr. who answered all questions and escorted staff around the site. A of inspection, staff were finishing up some overtime work and one of the spray booths was being operated the inspection it is noted that the facility maintains good work practices, and the facility was well maintain demonstrated good housekeeping. The following discusses the review of records supplied by Noron Com Technologies, Inc.

EULAMINATION

I. Emission Limit

VOC (including Styrene) 11.1 TPY: As of July 2018, 12-month rolling time period VOC emissions ar tons. This meets the permit condition.

II. Material Limit

VOC content of Production Resins 34% by weight: Formulated specifically for this facility at 34% b or less.

VOC Content of Tooling Resins 50% by weight: Formulated specifically for this facility is 50% by w less.

Compliance for these limits is determined through certificates of analysis and SDS sheets which are up to

III. Process/Operational Restrictions

The permittee shall not operate any booth associated with EULAMINATION unless its respective e filter is installed, maintained and operated in a satisfactory manner. This condition is being met as during inspection.

IV. Design/Equipment Parameters

The permittee shall equip and maintain the spray booths in EULAMINATION with non-atomized ap technology with equivalent or lower styrene emission rates for the application of production resins condition is being met as observed during inspection.

V. Testing/Sampling

Not Applicable

VI. Monitoring/Recordkeeping

The permittee shall keep records of the VOC content for each shipment of production and tooling r received. These records are being kept and have been reviewed.

The permittee shall keep monthly records of the following for EULAMINATION:

The identity and amount (in pounds) of each resin used, the VOC content of each resin use appropriate emission factor for each raw material used, and the VOC monthly emission rate per calendar month as well as 12-month rolling time period. These records have been supp reviewed. This condition is being met.

VII. Reporting

All semi-annual and annual deviation reporting has been completed and received in a timely manne Reports are reviewed when received and are documented in MACES.

Annual Certification of compliance was received on time and was reviewed when received.

VIII. Stack/Vent Restrictions

There are three stacks associated with EULAMINATION. The stacks are within compliance with exh dimensions as well as minimum height above ground. The exhaust gases from the stacks are disc unobstructed vertically upwards.

EUGELCOAT

I. Emission Limit

VOC 18 TPY: As of July 2018, 12-month rolling time period VOC emissions are 2.63 tons. This mee permit limit condition.

II. Material Limit

Material	Limit	Actual	Equipment	Underlying Applicable Requirement
VOC content of Clear Gelcoats	48% by weight	48%	EUGELCOAT	R 336.1225, R 336.1702
Styrene Monomer of Clear Gelcoats	48% by weight	31%	EUGELCOAT	R 336.1225, R 336.1702
VOC content of White Gelcoats	36% by weight	36%	EUGELCOAT	R 336.1225, R 336.1702
Styrene Monomer content of White Gelcoats	31% by weight	30%	EUGELCOAT	R 336.1225, R 336.1702
VOC Content of Color Gelcoats (non-white)	45% by weight	42%	EUGELCOAT	R 336.1225, R 336.1702
Styrene Monomer content of Color Gelcoats (non-white)	40% by weight	37%	EUGELCOAT	R 336.1225, R 336.1702
VOC content of Tooling Gelcoats	48% by weight	46%	EUGELCOAT	R 336.1225, R 336.1702
Styrene Monomer content of Tooling Gelcoats	43% by weight	42%	EUGELCOAT	R 336.1225, R 336.1702
MMA Monomer content of All Gelcoats	10% by weight	10%	EUGELCOAT	R 336.1225, R 336.1702

III. Process/Operational Restrictions

The permittee shall not operate any booth associated with EUGELCOAT unless its respective exha installed, maintained and operated in a satisfactory manner. This condition is being met as observ inspection.

IV. Design/Equipment Parameters

Not Applicable

V. Testing/Sampling

Not Applicable

VI. Monitoring/Recordkeeping

The permittee shall keep monthly records of the following for EUGELCOAT:

The identity and amount (in pounds) of each gelcoat used, the styrene, MMA and VOC cont each gelcoat used, the appropriate emission factor for each raw material used, and the VO(emission rate in tons per calendar month as well as 12-month rolling time period. These re have been supplied and reviewed. This condition is being met.

VII. Reporting

All semi-annual and annual deviation reporting has been completed and received in a timely mann Reports are reviewed when received and are documented in MACES.

Annual Certification of compliance was received on time and was reviewed when received.

VIII. Stack/Vent Restrictions

There are four stacks associated with this EU. The stacks are within compliance with exhaust dim well as minimum height above ground. The exhaust gases from the stacks are discharged unobst vertically upwards.

EUMISCMATERIALS

I. Emission Limit

VOC limit 6.3 TPY: As of July 2018, the 12-month rolling time period VOC emissions are 0.89 tons. meets the conditions of the permit.

II. Material Limit

Not Applicable

III. Process/Operational Restriction

Not Applicable

IV. Design/Equipment Parameter

Not Applicable

V. Testing/Sampling

Not Applicable

VI. Monitoring/Recordkeeping

Not Applicable

VII. Reporting

All semi-annual and annual deviation reporting has been completed and received in a timely mann Reports are reviewed when received and are documented in MACES.

Annual Certification of compliance was received on time and was reviewed when received.

VIII. Stack/Vent Restrictions

There are five stacks associated with this EU. The stacks are within compliance with exhaust dime well as minimum height above ground. The exhaust gases from the stacks are discharged unobst vertically upwards.

EUCLEANUP

Acetone used for cleanup activities.

I. Emission Limit

Acetone limit 30 TPY: As of July 2018, the 12-month rolling time period Acetone Usage is 7.09 tons meets the conditions of the permit.

II. Material Limit

Not Applicable

III. Process/Operational Restriction

All wasted acetone used shall be captured and stored in closed containers and disposed of in an a manner in compliance with all applicable state rules and federal regulations. This condition is beir observed during inspection.

IV. Design/Equipment Parameter

Not Applicable

V. Testing/Sampling

Not Applicable

VI. Monitoring/Recordkeeping

The permittee shall keep records of the following information:

The identity and amount (in gallons or pounds) of acetone used, gallons or pounds of acet reclaimed, acetone monthly emission rate in tons per calendar month and 12-month rolling period. Records have been reviewed and are acceptable.

VII. Reporting

All semi-annual and annual deviation reporting has been completed and received in a timely mann Reports are reviewed when received and are documented in MACES.

Annual Certification of compliance was received on time and was reviewed when received.

VIII. Stack/Vent Restrictions

There are five stacks associated with this EU. The stacks are within compliance with exhaust dime well as minimum height above ground. The exhaust gases from the stacks are discharged unobsti vertically upwards.

FGMACT

I. Emission Limit(s)

The permittee shall keep records of the following information:

The identity and amount (in gallons or pounds) of acetone used, gallons or pounds of aceto reclaimed, acetone monthly emission rate in tons per calendar month and 12-month rolling period. Records have been reviewed and are acceptable.

VII. Reporting

All semi-annual and annual deviation reporting has been completed and received in a timely manni Reports are reviewed when received and are documented in MACES.

Annual Certification of compliance was received on time and was reviewed when received.

VIII. Stack/Vent Restrictions

There are five stacks associated with this EU. The stacks are within compliance with exhaust dime well as minimum height above ground. The exhaust gases from the stacks are discharged unobsti vertically upwards.

FGMACT

I. Emission Limit(s)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Ap Requirem
Organic HAP	88 Pounds per Ton resin applied	12 month rolling average / Open Molding – Non-corrosion resistant and/or high strength (CR/HS) Resin, Mechanical Application	EULAMINATION	SC VI.1	40 CFR 63.580 and Table 3 to subpart WWW
Organic HAP	87 Pounds per Ton resin applied	12 month rolling average / Open Molding – Non-CR/HS Resin, Manual Application	EULAMINATION	SC VI.1	40 CFR 63.580 and Table 3 to subpart WWW
Organic HAP	254 Pounds per Ton resin applied	12 month rolling average Open Molding –	EULAMINATION	SC VI.1	40 CFR 63.580 and Table 3 to subpart WWW

		Tooling Resin, Mechanical Operation			
Organic HAP	157 Pounds per Ton resin applied	12 month rolling average Open Molding – Tooling Resin, Manual Application	EULAMINATION	SC VI.1	40 CFR 63.580 and Table 3 to subpart WWW
Organic HAP	440 Pounds per Ton gel coat applied	12 month rolling average Open Molding – Gel Coat, Tooling	EUGELCOAT	SC VI.1	40 CFR 63.580 and Table 3 to subpart WWW
Organic HAP	267 Pounds per Ton gel coat applied	12 month rolling average Open Molding – Gel Coat, White/off White Pigmented Gel Coating	EUGELCOAT	SC VI.1	40 CFR 63.580 and Table 3 to subpart WWW
Organic HAP	377 Pounds per Ton gel coat applied	12 month rolling average Open Molding – Gel Coat All Other Pigmented Gel Coating	EUGELCOAT	SC VI.1	40 CFR 63.580 and Table 3 to subpart WWW
Organic HAP	522 Pounds per Ton gel coat applied	12 month rolling average Open Molding – Gel Coat clear production gel coat	EUGELCOAT	SC VI.1	40 CFR 63.580 and Table 3 to subpart WWW

facility demonstrates compliance with the emission limits for gelcoats using the weighted average option (c). Compliance for resins is demonstrated using the HAP content limit option 63.5810(d) and Table 7 of Su WWWW. Records of material HAP contents and usage are maintained each month as well as emission calculations. Certificates of analysis are available for some gel coats and resins but data from the SDS is u emission calculations. This is acceptable per 63.5895(c). Records review indicates compliance with the ap emission limits.

II. Material Limit

Not Applicable

III. Process/Operational Restrictions

All waste catalysts, resins, and gelcoats used shall be captured and stored in closed containers an in an acceptable manner in compliance with all applicable state rules and federal regulations. This being met as observed during inspection.

Permittee shall not use cleaning solvents that contain HAP. The facility uses acetone only for clea condition is being met as observed during inspection.

Permittee shall keep containers that store HAP-containing materials closed or covered except duri addition or removal of materials. This condition is being met as observed during inspection.

IV. Design/Equipment Parameter

Not Applicable

V. Testing/Sampling

The HAP content of any resin, gelcoat, etc., as received and as applied shall be determined using manufacturer's formulation data, or other information as deemed acceptable. The facility uses mat specifically for them and the manufacturer provides this data.

VI. Monitoring/Recordkeeping

The permittee shall maintain records of resin and gel coat use, organic HAP content, and operatior the resin is used if meeting any organic HAP emission limits. This information is being kept and m conditions of the permit.

Permittee must retain the records of resin and gel coat organic HAP content and must include the l these resins and gelcoats and identify their application methods in the semiannual compliance rep Reports are reviewed as received.

The permittee must demonstrate continuous compliance with each standard that applies in the foll

Compliance with organic HAP emission limits

Compliance with the work practice standards.

Records indicate the facility is in continuous compliance with HAPS emission limits and inspectior facility indicates compliance with work practice standards.

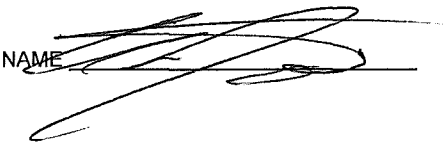
VII. Reporting

All semi-annual and annual deviation reporting has been completed and received in a timely manr Reports are reviewed when received and are documented in MACES.

Annual Certification of compliance was received on time and was reviewed when received.

VIII. Stack/Vent Restriction

Not Applicable

NAME  DATE 9/14/2018 SUPERVISOR