

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

N210941838

FACILITY: Giffin, Inc.		SRN / ID: N2109
LOCATION: 1900 Brown Rd., AUBURN HILLS		DISTRICT: Southeast Michigan
CITY: AUBURN HILLS		COUNTY: OAKLAND
CONTACT: Randy Cleghorn, Project Scheduler		ACTIVITY DATE: 08/14/2017
STAFF: Robert Joseph	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Scheduled inspection to verify the status of Permit to Install 279-89.		
RESOLVED COMPLAINTS:		

On Monday, August 14, 2017, Michigan Department of Environmental Quality-Air Quality Division staff Robert Joseph and Kerry Kelly conducted a scheduled inspection of Giffin, Inc. located at 1900 Brown Road, Auburn Hills, Michigan. The purpose of the inspection was to verify the facility's compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; Michigan Department of Environmentally Quality-Air Quality Division (MDEQ-AQD) Administrative Rules and conditions of Permit to Install (PTI) No. 279-89. The permit was originally issued to Autocomp Division, Decoma Plastics. Giffin Inc. began operations at this location over 6 years ago after Autocomp vacated the building. The emission unit associated with the permit is a Resin Transfer Molding machine that is no longer in operation and has been removed from the site.

We arrived at the facility at approximately 1:30pm and met with Randy Cleghorn, Project Scheduler, and Brian Thom, Purchasing Agent. We introduced ourselves and stated the purpose of our inspection to both Randy and Brian and they accompanied us into the facility. Once we entered the operations area we met with Terry, the Operations Manager. The facility operates nearly 24 hrs a day with approximately 120 employees. We verified that the Resin Transfer Molding machine was no longer on site and Terry explained the facility's operations. The facility paints and welds sheet metal auto supplies and designs air supply housing and booths.

Laser cutting is first performed on all the sheet metal before it is welded. The laser cutting is supplied by pressurized Carbon Dioxide (CO₂) and Oxygen (O₂) and is exempt under Rule 284 (2)(j) which states the following;

R 336.1284 Permit to install exemptions; containers.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to containers, reservoirs, or tanks used exclusively for any of the following:

- (j) Pressurized storage of acetylene, hydrogen, oxygen, nitrogen, helium, and other substances, excluding chlorine and anhydrous ammonia in a quantity of more than 500 gallons, that have a boiling point of 0 degrees Celsius or lower.

The welding and laser cutting process is exempt under Rule 285 (2)(i) and (2)(i)(vi)(B), respectively which states the following;

R 336.1285 Permit to install exemptions; miscellaneous.

(2) The requirement of R 336. 1201(1) to obtain a permit to install does not apply to any of the following:

- (i) Brazing, soldering, welding, or plasma coating equipment.

R 336.1285 Permit to install exemptions; miscellaneous.

(2) The requirement of R 336. 1201(1) to obtain a permit to install does not apply to any of the following:

- (i) The following equipment and any exhaust system or collector exclusively serving the equipment:
 - (vi) Equipment for cutting which meets the following:
 - (B) Equipment that has emissions that are released only into the general in-plant environment.

We also observed (2) paint booths where the coating of the metal parts is performed. The parts are first cleaned with rags dipped in Toluene and then hung up to air dry within the booths. Once dried, the rags are placed in a

closed drum and are not reused. The spray guns are used to coat the metal parts and are soaked in distilled water. The used fluid is placed in a drum and removed off site by an outside contractor. The paint booths have bag filters which are monitored by static pressure gauges to determine replacement.

The cleaning of the metal parts before coating appears to be exempt under Rule 290(2)(a)(i) which states the following;

(a) An emission unit which meets any of the following criteria:

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the emission units listed in subdivision (a) of this subrule, if the conditions listed in subdivisions (b), (c), (d), and (e) of this subrule are met. Notwithstanding the definition in R 336.1121(a), for the purpose of this rule, uncontrolled emissions are the emissions from an emission unit based on actual operation, not taking into account any emission control equipment. Controlled emissions are the emissions from an emission unit based on actual operation, taking into account the control equipment.

(a) An emission unit which meets any of the following criteria:

(i) Any emission unit that emits only noncarcinogenic volatile organic compounds or noncarcinogenic materials that are listed in R 336.1122(f) as not contributing appreciably to the formation of ozone, if the total uncontrolled or controlled emissions of air contaminants are not more than 1,000 or 500 pounds per month, respectively.

The facility submitted their Toluene usage for the last two years and their total consumption for the year for both booths was 110 gallons. Given the density of the solvent the facility's usage is approximately 65 pounds per month which is under the limit to meet the exemption. However, given the facility has two cleaning stations the potential to emit for VOC's is 1,000 lbs. per month (uncontrolled emissions for air contaminant) for each station. This is based on the above Rule 290(i). Given the VOC is 100% Toluene (HAP), the potential to emit for a single HAP from the both cleaning stations is a combined 12 tons per year (1,000 lbs. per month for each booth for a total of 24,000 lbs.), which is above the Title V major source threshold for a single HAP (10 tons per year). The facility was advised via email to obtain a Title V Opt-Out Permit which will set their HAP limit to under 10 tons per year for a single HAP, and under 25 tons per year for aggregate HAPS.

The paint booths may be exempt under Rule 287 (2)(c) which states the following;

R 336.1287 Permit to install exemptions; surface coating equipment.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(c) A surface coating line if all of the following conditions are met:

- (i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.
- (ii) Any exhaust system that serves only coating spray equipment is supplied with a dry filter control or water wash control which is installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator develops a plan which provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.
- (iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the department upon request.

The facility submitted their paint usage which meets the exemption status for coating use under 200 gallons. The facility was advised via email to obtain a General Coating Permit and the guidelines that are necessary to meet this exemption.

After observing the paint booths, we discussed some of the exemption options with the facility as stated above. This concluded our inspection and we thanked the facility personnel for their time and cooperation. I advised the facility that I would provide follow-up information as outlined above regarding permit information.

Conclusion

The Resin Transfer Molding process equipment relating to PTI 279-89 is no longer on site. The facility now

performs multiple operations which includes laser cutting, the painting and welding of sheet metal auto supplies and the designing of air supply housing and booths.

The laser cutting and welding are both exempt processes, and the coating operation of the auto supplies are exempt provided the requirements are met as stated in Rule 287 (c). Based on the records provided by the facility, the criteria meeting the exemption have been met, however, they were advised to obtain a General Coating Permit and a facility wide Title V Opt-Out permit due to their potential to emit hazardous air pollutants above major source threshold.

NAME Robert Joseph DATE 09/30/17 SUPERVISOR SK