

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

N214868790

FACILITY: Novares - Howell		SRN / ID: N2148
LOCATION: 1301 McPherson Park Dr., HOWELL		DISTRICT: Lansing
CITY: HOWELL		COUNTY: LIVINGSTON
CONTACT: Amber Elmore, Plant QHSE Leader		ACTIVITY DATE: 04/20/2023
STAFF: Matthew Karl	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: On site inspection as part of FCE for FY2023.		
RESOLVED COMPLAINTS:		

On 04/20/2023, I (Matt Karl) conducted a scheduled inspection of Novares – Howell (formerly Key Plastics LLC Howell Plant). The purpose of this inspection was to determine compliance with permit to install (PTI) No. 275-02.

**Facility Contact:**

Amber Elmore, Plant QHSE Leader, aelmore@novaresteam.com

**Regulatory Overview:**

The facility has a synthetic minor permit for volatile organic compounds (VOCs) and hazardous air pollutants (HAP). PTI No. 275-02 has facility-wide emission limits that limit VOC emissions to 90 tons per year (TPY), which is below the 100 TPY threshold to be considered a major source. There are also facility-wide HAPs emission limits to limit individual HAPs to less than 9 TPY and aggregate HAPS to less than 22.5 TPY, which are below the 10 TPY and 25 TPY respective thresholds to be considered a major source of HAPs .

**Facility Description:**

The Novares – Howell facility is in an industrial park on the west side of Howell. Approximately 400 feet to the north and east is a large residential subdivision. Within approximately 300 feet to the southeast, south and west are other industrial facilities.

The Novares – Howell facility performs injection molding and painting of plastic automobile parts.

**Site Inspection:**

I arrived on site at approximately 10am. The temperature as reported by the Apple Weather App was 49°F, it was overcast, with wind 12 mph from the southeast, with gusts up to 23 mph. I approached the facility from the northwest proceeding southeast along S. Highlander Way and McPherson Park Dr. I noticed a slight solvent odor in the parking lot.

I met with facility contact Amber Elmore. We discussed MAERS and the facility's recordkeeping. The facility is keeping material use and emissions records in a spreadsheet. The spreadsheet includes information on coating and solvent use, and VOC emissions are being kept in pounds per day (lb/day), tons per month (ton/month) and tons per 12-month rolling time-period (ton/year). The facility is keeping copies of Material Safety Data Sheet (MSDS)/manufacturer's formulation data for the materials used at the facility. The information is all there, but improvements could

be made to make it easier to compare what is being kept in the facility's emissions spreadsheet with the emission limits/condition requirements in PTI No. 275-02.

We then performed a walkthrough of the facility. The main emission unit is the EU-PBPLINE2 coating line. We toured the paint mix room. I noted that the coatings were being kept in closed drums. I noted there were some buckets with dirty rags in the room. Amber and I discussed using closed containers for dirty rags. We performed a walkthrough of the power wash system. We performed a walkthrough of the seven (7) spray booths. They consist of two manual spray prime booths, three robotic color booths, and two robotic clear booths. Coatings are applied using HVLP applicators. There are two bake ovens used to cure coatings after the spray booths. The two bake ovens were operating at a temperature of 155-156°F. Emissions from the EU-PBPLINE2 are controlled by a 3-stage fabric filter collector, a rotary zeolite concentrator and a recuperative thermal oxidizer (RCO). The rotary zeolite concentrator had a desorb set point of 355°F and was operating at 267°F. The RCO setpoint was 1550°F and was operating at 1574°F, which was well above the required temperature of 1300°F. The facility maintains a maintenance checklist sheet near the control panel. Routine maintenance is being conducted, such as replacing seals on the RCO.

The EU-PBPLINE2 and the RCO are 30 years old, and Amber informed me that the facility is considering replacing the existing coating line with a coating paint line and replacing the RCO with a new RTO.

I departed the facility at approximately 11am.

I have included a summary of the emission limits in PTI No. 275-02 and the emissions reported by the facility below:

**EU-PBPLINE2**

Plant 2 consists of a plastics parts coating system. The system includes a paint mix room, water based power wash system, seven (7) downdraft water wash spray booths, and two (2) bake ovens controlled by a rotary zeolite concentrator/recuperative thermal incinerator preceded by a fabric filter collector.

Pollutant	Limit	Reported
VOC	69.0 TPY	8.7 (Jan-Dec 2022)
VOC	662.4 lb/day	98.3 (Dec 2022)

**FGFACILITY**

All equipment at the stationary source including equipment covered by other permits, grand-fathered equipment and exempt equipment.

Pollutant	Limit	Reported
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Each Individual HAP	9.0 TPY	0.4 (methanol CAS No. 67-56-1)*
Aggregate HAPs	22.5 TPY	1.0 (Jan-Dec 2022)*
VOCs	90.0 TPY	10.5 (Jan-Dec 2022)

\*These numbers are estimates. The facilities recordkeeping could be improved to better show individual/aggregate HAPs totals.

**Summary:**

The Novares – Howell facility appeared to be complying with the requirements of PTI No. 275-02.

NAME Matthew R. Kaul

DATE 8/29/23

SUPERVISOR AB