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

N219867905

FACILITY: Grupo Antolin Howell		**SRN / ID:** N2198
LOCATION: 3705 WEST GRAND RIVER RD., HOWELL TWP		**DISTRICT:** Lansing
CITY: HOWELL TWP		**COUNTY:** LIVINGSTON
CONTACT: Jim Ulrey , EHS Coordinator		**ACTIVITY DATE:** 06/29/2023
STAFF: David Rauch	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: An unannounced routine inspection of the facility to ensure compliance with PTI 52-09B.		
RESOLVED COMPLAINTS:		

On June 29, 2023 the State of Michigan's (SOM), Environment Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted a routine inspection of Grupo Antolin. The facility location is at, 3705 Grand River Ave Howell, MI.

The Environmental Contact:

Jim Ulrey, HSE Coordinator, 517-672-0393, jim.ulrey@grupoantolin.com

Facility Description:

This facility makes car parts from the big 3 and other car companies. The Grupo Antolin uses various processes to create car parts for doors, trunks, and interior parts. The facility uses spray booths to paint parts, uses fiberglass coatings for specific parts, as well as presses to form plastic parts. There are multiple assembly lines in the building that are used to put all the parts together for a final part that will be used for the doors, trunks, or dashboards.

Regulatory Overview:

This facility is an Opt-Out source that has shown its potential to emit is less than that of a "Major" source. This facility was previously a major source, as of 2003 they have shown PTE below Major thresholds. The source must maintain accurate records to stay as an opt-out source.

Facility History:

This facility has produced car parts since the issuance of the 1989 PTI 529-89 and 529-89A. The facility had 3 permits through the 1990s when PTI 484-94 was issued in 1994. The facility voided these permits due to exemptions covering the processes and the paint line was permitted under a new PTI in 2009. The facility currently operates under PTI 52-09A. The facility was also a Title V ROP source based on their Potential to Emit. In 2003 the facility was removed from the ROP program as they submitted documents showing their PTE was less than "Major Sources" for HAPs and VOCs.

Inspection:

Arrived at the facility at 9:04am and walked into the lobby where guests are to sign in and use a computer to call for Jim Ulrey. The computer system is the only way to communicate with people inside the plant and request for a staff member to allow you in, there are no front office staff. Once in the facility we found a conference room to set up for the paperwork side of the inspection. Prior to the sit-down portion, we conducted the walk through of the facility. When you walk through the front doors of the manufacturing area you see how large the building is and

how much equipment the facility houses. The first place we went to was the multiple presses that were in line in the middle of the plant and creating the plastic parts the facility uses to assemble the car parts. The next area I was taken to was the paint booth which is housed in a separate room from the rest of the plant.

The paint booth had 3 separate chambers that parts would pass through as they were painted. The paint line was closed, and the water systems are filtered to pull solids out into a filter bag where the water drips out and is incorporated into the system. The painted parts go through the bake oven after the paint line, and this oven has its own set of digital readings showing proper pressure and temperature for the unit. Next to the paint line and oven is the digital display for the RTO system which does monitoring every 10 minutes where a data set is recorded into an excel sheet. The RTO was operating at an appropriate level and maintained a temperature over 1450°F. Just past the paint line is an area of the building that is under construction as they build a new slush equipment for powder skins. This process is not currently operational. Facility will need to find exemption or applicable rule for process, and where the process will exhaust.

Continued the walk through the plant where the resin mold presses were observed and the different styles of forming lines. The different lines were used to make different fiberglass products that make interior parts for the vehicles and the parts were cut and assembled in the water jet cutting systems. The other parts were taken to an assembly station where they were tacked, glued, or pressed together.

Full walk through of the facility concluded with a meeting in the conference room with Jim Ulrey to discuss the facility records and monitoring systems to comply with the permit. Records were well maintained and readily available upon request. Jim also had folders of information on hand to make sure AQD staff is aware of monitoring and malfunction plans.

Facility has a detailed malfunction abatement plan (MAP) to ensure that the paint system is operated properly. MAP includes the Water Wash System that is used to control the paint spray booths. It also contains detail on the paint capture system and how the pressure of the unit is monitored and maintained to keep air flow moving the correct direction.

Left the facility around 11:14am.

Equipment	Exemption/PTI	Description	Compliance
EU-FormingLine2/3	285(e)	A line that combines fiberglass rolls with a vinyl that is then heat pressed into a sheet that is cut by the water jet system. Controlled by fabric filters.	Yes
EU-WaterTrim1/2	285(2)(l)(vi)	A water jet trim system used to cut out proper design of fabric to fit the particular part. Controlled by a cyclone.	Yes

EU VinylADHERE	**285(e)**	**This process uses heat to bind the vinyl fabric to the fiber glass rolls. Controlled by fabric filters.**	**Yes**
EU-PartsWASH	**281(2)(h)**	**A small parts washer in the maintenance area and is under 10sq ft.**	**Yes**
EU-MaintShop	**285(2)(l)(vi)(A)**	**A maintenance shop that is used for in shop repairs and works on equipment for functions withing the facility.**	**Yes**
EU-C1	**290**	**A line that compresses fiberglass sheets into boards used for door liners. Usage under 500lbs per month. Uses Xylene as a cleaner.**	**Yes**
EU-Paint	**52-09B**	**A paint line that is enclosed completely from the rest of the facility and has an RTO system and negative pressure for the controls.**	**Yes**
FG-InjectionMold	**286(2)(b)**	**These are the lines of press mold that use heated resin pellets to create the plastic panels that are used in the facility. Recycling occurs on site to reuse panels that are not useable for cars.**	**Yes**
FG-Tanks	**284(2)(i)**	**Tanks inside the facility that are 4,000gals, contents are used for the assembly line processes.**	**Yes**
FG-ReactinMold	**286(2)(e)**	**Robots in a loop apply a wax to parts and then a chemical adhesive is added to bind the sheets to form parts used in the target vehicle. Controlled by fabric filters.**	**Yes**
FG-Lambda	**290**	**This unit is not currently in use.**	
FG RURTLINE	**286(2)(d)**	**This unit was used to make parts for minivans and used to create fiberglass boards for the interior of the vans. Controlled by Fabric Filters.**	**Yes**

FG-Thermoform	**286(2)(d)**	**This line takes preformed plastic boards and sends them through a 3-stage plastic oven to heat the plastic and then it is placed into a press to shape. Vented externally controlled by fabric filters.**	**Yes**
FG-EMERGEN	**282(2)(b)(i)**	**Three emergency generators, only 1 is in use, and the total run hours are currently at 197.5hrs.**	**Yes**

FG-ASSEMBLY

There are assembly sites throughout the plant, assembly was occurring by hand using clips and glues. Assembly has various tasks in putting together the parts for each vehicle and the tasks are broken up throughout the plant.

FG-EMERGEN

The facility has three emergency generators on site. Of the 3 EU_EMERGEN only one operates which is a natural gas fired generator near the employee smoking area. The operational generator has a max BTU of 645,000. A log of run hours is maintained on site and was provided to AQD for review, total run time was at 197.5 hours.

EU-PAINT

SC III.1. The permittee shall capture all waste coatings, cleanup solvents, *etc.* (materials) and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations. The facility has a waste bag that collects the solids out of the water and hangs to drip out any excess water, the remaining solids are removed and sent out as waste.

SC III.2. The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary. No open containers were observed during the inspection.

SC III.3. The permittee shall not operate EUPAINT unless a malfunction abatement plan (MAP) as described in Rule 911(2), has been submitted within 60 days after commencement of trial operation, is implemented and maintained. The MAP was maintained on site and staff operates under the MAP per Jim Ulrey.

SC III.4. The permittee shall maintain a minimum of 0.007 inches of water pressure differential between the PTE and the adjacent area on a continuous basis. Facility maintains a constant log of the pressure drop on site and it is recorded in 10-minute intervals.

SC IV.1. The permittee shall not operate each booth portion of EUPAINT unless water wash particulate control is installed and operating in a satisfactory manner. The water wash system was operating during the inspection and there appeared to be no issues.

SC IV.2. The permittee shall equip and maintain each booth portion of EUPAINT with electrostatic high volume low pressure (HVLP) applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing. Observed staff working with the caps that were not in use for the sprayers, and the test caps were on the work station. Staff showed the sprayer heads, and they appeared to be in compliance.

SC IV.3. The permittee shall not operate EUPAINT unless the Regenerative Thermal Oxidizer (RTO) is installed, maintained and operated in a satisfactory manner. Satisfactory operation of the RTO includes, a minimum VOC destruction efficiency of 95 percent (by weight), maintaining a minimum combustion zone temperature of 1450°F, or the minimum combustion zone temperature from the most recent acceptable stack test, and a minimum retention time of 0.5 seconds. The RTO was operating and maintained a temperature at 1529°F during the inspection. The RTO settings are displayed on a digital screen near the water waste bag in the facility. The RTO Destruction Efficiency was shown to be 96% based on the Test Report on site.

SC IV.4. The permittee shall install, calibrate, maintain and operate in a satisfactory manner a temperature monitoring device in the combustion chamber of the RTO to monitor and record the temperature on a continuous basis, during operation of EUPAINT. The digital recording center for the RTO was working correctly during the inspection.

SC IV.5. The permittee shall not operate EUPAINT unless the PTE is installed, maintained, and operated in a satisfactory manner. Satisfactory operation requires that the PTE is operating at a pressure lower than all adjacent areas, so that air flows into the PTE through all natural draft openings (NDOs) to achieve a minimum VOC capture efficiency of 100 percent (by weight). NDO is defined as any opening that is not connected to a duct in which a fan or blower is installed. The two openings for the EUPaint are the entry to the paint line and the exit of the paint line. The facility monitors the exit of the paint line to ensure the pressure drop is appropriate.

SC IV.6. The permittee shall install, calibrate, maintain, and operate, in a satisfactory manner, a differential pressure gauge to monitor the pressure differential between the PTE for EUPAINT and the adjacent area on a continuous basis during operation of any portion of EUPAINT. Facility has installed the correct monitoring equipment.

SC V.1. The permittee shall determine the VOC content, water content, and density of any coating as applied and as received, using federal Reference Test Method 24. Upon prior approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance. Facility has SDS forms from Manufacturers.

SC V.2. Within 180 days after completion of trial operation, verification of the destruction efficiency of the RTO, by testing at owner's expense, in accordance with Department requirements will be required. No less than 60 days prior to testing, a complete test plan shall be submitted to the AQD Technical Programs Unit and District Office. The final plan must be

approved by the AQD prior to testing. Verification of the destruction efficiency of the RTO includes the submittal of a complete report of the test results to the AQD within 60 days following the last date of the test. RTO was tested in 2017 and the results showed a destruction efficiency of 96%.

SC VI.1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. Reviewed records with Jim Ulrey and records were sent over to AQD via email.

SC VI.2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material (coating, reducer, etc.), including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. Facility has SDS forms and sent records over via email for review.

SC VI.3. The permittee shall keep the following information on a calendar month basis for EUPAINT:

a. Gallons (with water) of each coating, reducer, purge and clean-up solvent, *etc.* (material) used and reclaimed.

b. VOC content (with water) of each material as applied.

c. VOC mass emission calculations determining the monthly emission rate in tons per calendar month.

d. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. Facility keeps accurate records of VOC for each year and a rolling excel chart for all VOC emissions since 2016. Facility records indicate VOCs for the following years; 2021= 3.01tpy, 2022=2.44tpy, 2023=1.28tpy

SC VI.4. The permittee shall monitor and record, in a satisfactory manner, the temperature in the RTO on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. Continuous temperature data recording shall consist of measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. Facility maintains records on an excel spreadsheet for each 10-minute interval for each day in the month. Checked records for March and May of the following years; 2021, 2022, 2023. Records indicate while operating the unit maintained the temperature above 1450^{o}F.

SC VI.5. The permittee shall monitor and record, in a satisfactory manner, the pressure differential between the PTE for EUPAINT and the adjacent area, on a continuous basis, to verify that air is entering the PTE. Continuous pressure differential data recording shall consist of

measurements made at equally spaced intervals, not to exceed 15 minutes per interval. The permittee shall keep all records on file and make them available to the Department upon request. The facility maintains these records on an excel spreadsheet as well and data is recorded very 10-minutes as well. Records were checked for the months of March and May for the following years; 2021, 2022, 2023. Per record review while the unit was operating the pressure drop was not below the 0.007in of water limit.

FG-FACILITY – All process equipment source-wide including equipment covered by other permits, grand fathered equipment and exempt equipment.

FG V.1. The permittee shall determine the HAP content of each coating, reducer, purge and clean-up solvent, *etc.* (material) as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311. The facility maintained records of the HAPs and records were available upon request.

FG VI.1. The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition. Facility maintains records and they are available upon request.

FG VI.2. The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. All records were maintained and available upon request.

FG VI.3. The permittee shall keep the following information on a calendar month basis for FGFACILITY:

a. Gallons or pounds of each HAP containing material used.

b. Where applicable, gallons or pounds of each HAP containing material reclaimed.

c. HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.

d. Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.

e. Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request. Facility was in compliance with 9tpy HAPs limit for each individual HAP and maintained the Aggregate HAPs well under the limit of 22.5 tpy. Aggregate HAPs were as follows for each year, 2021=3.05 tons, 2022= 3.81 and 2023= 1.68 tons.

Fee Status:

This facility is an opt-out source for HAPs and VOCs and is a Fee Category E in MAERS. They do not currently pay MAERS Fees.

Location:

This facility is located at 3705 W Grand River Ave. The Best route to get to the facility is to go North on Burkhart Rd and turn onto Grand River Ave. The facility is in a very industrial section of Howell. The facility has businesses on all sides and a small airport to the north.

Facility Record Keeping:

Month Emissions	EU-Paint	FG-FormingLine	FG-ReactinMold539	FG-RURTLINE	EU-554	EU-C1	Total HAPs
Jan-21	0.28	0.10	0.05	0.09	0	0	.18
Feb-21	0.26	0.08	0.04	0.26	0	0	.27
Mar-21	0.16	0.07	0.03	0.32	0	0	.3
Apr-21	0.23	0.13	0.13	0.00	0	0	.21
May-21	0.26	0.09	0.07	0.06	0	0	.18
Jun-21	0.20	0.14	0.10	0.17	0	0.04	.33
Jul-21	0.20	0.12	0.05	0.04	0	0	0
Aug-21	0.00	0.08	0.08	0.03	0	0	0
Sep-21	0.01	0.05	0.27	0.00	0	0.01	.23
Oct-21	0.05	0.10	0.23	0.29	0	0	.48
Nov-21	0.09	0.10	0.06	0.22	0	0.04	.27
Dec-21	0.19	0.05	0.14	0.14	0	0.02	.26

21-Tons	1.92	1.11	1.25	1.60	0	0.11	3.05
Jan-22	0.28	.10	.06	.12	0	.05	.23
Feb-22	.26	.10	.07	.24	0	0.05	.34
Mar-22	.16	.09	.04	.38	0	.09	.4
Apr-22	.13	.06	.10	.30	0	.05	.31
May-22	.20	0.08	.07	.05	0	.13	.28
Jun-22	.18	.13	.13	.08	0	.07	.33
July-22	.08	.10	.11	.12	0	.07	.24
Aug-22	.23	.06	.06	.09	0	.09	.27
Sept-22	.25	.06	.18	.00	0	.10	.26
Oct-22	.26	.11	.19	.22	0	.11	.47
Nov-22	.20	.09	.12	.26	0	.09	.38
Dec-22	.21	.06	.18	.15	0	.08	.3
22-Tons	2.44	1.03	1.30	2.01	0	0.99	3.81
Jan-23	0.28	0.10	0.06	0.12	0	0.04	.22
Feb-23	0.22	0.06	0.13	0.21	0	0.11	.33
Mar-23	0.26	0.09	0.04	0.34	0	0.08	.39
Apr-23	0.23	0.09	0.23	0.37	0	0.11	.57
May-23	0.29	0.07	0.18	0.20	0	0.10	.33

23-Tons	**1.28**	**0.41**	**0.64**	**1.24**	**0**	**0.44**	**1.68**

Rolling HAPs as of May 23: 4.09 Tons. Rolling VOC as of May 23: 2.68 Tons

Conclusions:

This facility was in compliance with PTI52-09A and the record keeping for the emissions units was well maintained. Facility EHS was knowledgeable and made the inspection very smooth. There were no violations to report during this inspection. AQD will need to reach out to facility to follow up on Slush Equipment for installation and applicable exemptions.

NAME David Rauch DATE 07/30/2023 SUPERVISOR RB