

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : NBHX Trim USA Corporation	SRN : N2614
Location : 1020 Seven Mile Road	District : Grand Rapids
	County : KENT
City : COMSTOCK PARK State: MI Zip Code : 49321	Compliance Status : Compliance
Source Class : MAJOR	Staff : Michael Cox
FCE Begin Date : 3/23/2022	FCE Completion Date : 3/23/2023
Comments : FY 2023 FCE	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/23/2023	MAERS	Compliance	Report submittal certification form received 3/17/23 (postmarked 3/15/23). Emissions are consistent with supporting documentation and the most recent inspection. This MAERS Report is acceptable.
03/22/2023	ROP SEMI 2 CERT	Compliance	Postmarked 3/15/23 Semiannual.Certification reported 1 deviations for failed stack test. CAM Excursions/Exceedances and CAM Monitoring downtime were not included in the report. These issues are technically resolved since the facility is now closed. No further action at this time.
03/22/2023	ROP Annual Cert	Compliance	Postmarked 3/15/23. Annual Certification reported 2 deviations for failed stack tests. This issue has been resolved since the facility is now closed.
02/14/2023	On-site Inspection	Compliance	Scheduled Unannounced Inspection

Activity Date	Activity Type	Compliance Status	Comments
10/05/2022	ROP Semi 1 Cert	Non Compliance	Postmarked 9/14/22. During this time period 1 deviation was reported. The deviation was described as cancelled RTO DE/CE test due to RTO malfunction. The facility stated the RTO was malfunctioning due to the damper not properly closing on the RTO. The facility has taken corrective action to replace the damper gasket. A VN was already issued to the facility for the failed stack test. No further action required at this time.
10/05/2022	Stack Test	Non Compliance	RTO Compliance Stack Test Report: Destruction Efficiency (DE) testing was done on 8/9/2022 and Capture Efficiency was done on 8/10/2022. The DE and CE's verified in this test will need to be used for emissions calculations until the next test. The DE was noted to be at an average of 88.95% which is below the required 95% DE. The CE was noted to be 95.78 %. Due to the low DE of the RTO, a VN was already sent to the facility to address this issue.
08/09/2022	Stack Test Observation	Non Compliance	Stack Test Observation
04/15/2022	ROP SEMI 2 CERT	Compliance	Postmarked 3/15/22. No deviations were reported in the Semi-annual Certification.

Activity Date	Activity Type	Compliance Status	Comments
04/15/2022	ROP Annual Cert	Compliance	Postmarked 3/15/22. Annual Compliance Report was submitted to the AQD. During this time period two deviations were reported. The two deviations were regarding FGDUST Special Condition III.1 and Special Condition VI.7. These deviations were described as a failure to maintain required pressure drop and failure to restore proper operation of the dust collectors serving FGDUST. The duration of the deviations were stated to be 6 months for the 1st Semiannual reporting period of 2021. The facility stated the reasons for the deviations were due to low production volume causing low pressure drop readings. The facility stated that continued inspections and preventative maintenance will be carried out to ensure proper operation.
04/15/2022	CAM Excursions/Exceedances	Compliance	Received 3/17/22: Postmarked 3/15/22: CAM Excursion/Exceedance Report was submitted to the AQD. During this time period no excursions or exceedances were reported. The form did include previous excursions during the January through June 2021 timeframe.
04/15/2022	CAM monitor downtime	Compliance	Received 3/17/2021 postmarked 3/15/2021. 40 CFR Part 64 Compliance Assurance Monitoring forms attached indicated that there was no instances of monitoring downtimes.

Name: Michael T. Cox

Date: 3/23/2023

Supervisor: HH