

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

N261459887

FACILITY: NBHX Trim USA Corporation		SRN / ID: N2614
LOCATION: 1020 Seven Mile Road, COMSTOCK PARK		DISTRICT: Grand Rapids
CITY: COMSTOCK PARK		COUNTY: KENT
CONTACT: Dan Madden , Plant and Environmental Manager		ACTIVITY DATE: 07/16/2021
STAFF: Michael Cox	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled unannounced inspection		
RESOLVED COMPLAINTS:		

On Friday July 16, 2021, AQD Staff Michael Cox (MTC) conducted an unannounced scheduled inspection of NBHX Trim (NBHX) located at 1020 Seven Mile Road, Comstock Park, MI 49321. The purpose of this inspection was to verify compliance with Renewable Operating Permit (ROP) No. MI-ROP-N2614-2017a. MTC arrived on site at approximately 8:00 am and contacted Mr. Dan Madden to conduct an inspection. No visible emissions or odors were noted upon arrival.

### Facility Description

NBHX is a manufacturer of high-end wood trim parts for the automotive industry. The facility consists of staining, coating, and sealing operations, as well as various wood working operations, including sanding, cutting, routing, and buffing, which are conducted robotically and manually. The facility is currently experiencing low customer orders and production. The facility is currently operating 4 days a week. NBHX Trim is a major source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) and is subject to the Title V program. The facility is in operation with Renewable Operating Permit (ROP) No. MI-ROP-N2614-2017a issued on October 10, 2017, and revised on March 11, 2020. The revision of ROP No. MI-ROP-N2614-2017a incorporated Permit to Install (PTI) No. 73-14A, which was active during the previous inspection. No significant changes have occurred to the process and associated control equipment since the last inspection per Mr. Madden.

### Compliance Evaluation

#### EUBLEACHBOOTH

This emission unit consists of a manual spray application of an aqueous solution of inorganic bleaching materials in a water wash spray booth and associated drying tunnel. EUBLEACHBOOTH is subject to an hourly hydrogen peroxide emission limit of 1.3 pounds per hour (pph) and is also subject to a 3.7 ton per year (tpy) limit of hydrogen peroxide per a 12-month rolling time period. Records were requested and reviewed from the time period of July 2019 through July 2021. NBHX Trim utilizes only one hydrogen peroxide containing material for this emission unit that is 30% hydrogen peroxide. The highest pounds per hour emission rate based on monthly total hydrogen peroxide emissions and operating hours was noted to be 0.15 pph for the months of February, March, June, and October 2020, which is within the permitted limit. For the months of February, March, June, and October 2020, 29.6 lbs of hydrogen peroxide was emitted. The highest hydrogen peroxide emission occurred during the 12-month rolling time period ending in October 2019 when 0.23 tpy of hydrogen peroxide was emitted which is within the permitted limit.

**EUBLEACHBOOTH** was observed during the site inspection. A water curtain system was observed installed for this emission unit. **EUBLEACHBOOTH** utilizes high-volume low-pressure (HVLP) spray technology with test caps available for pressure testing. Test caps were noted to be available during the facility tour. Per special conditions (SC).VI.3 (a-e), NBHX Trim shall keep usage rates of each hydrogen peroxide material used, reclaim of materials (if applicable), hydrogen peroxide contents of each material, and emissions per a monthly / 12-month rolling time period. Based on the records requested and reviewed, NBHX Trim is keeping track of applicable records.

Two stacks are associated with this emission unit and were observed during the inspection. The stacks were observed venting unobstructed vertically and appeared to be consistent with the listed values in the MI-ROP-N2614-2017a. No visible emissions were noted coming from the stacks.

**EUBLEACHBOOTH** is included in the Malfunction Abatement Plan (MAP) and Preventative Maintenance Plan (PMP). The most recent MAP/PMP is dated December 2011 and a copy was received with the previous ROP renewal application. Applicable records were requested for select time periods. After further review, NBHX Trim appears to overall be following the MAP/PMP in place.

#### **EUSTAIN**

This emission unit consists of a spray application of wood stain in three spray booths and associated drying room. **EUSTAIN** is subject to a combined VOC and acetone emission limit of 13.7 tpy per a 12-month rolling time period. Records were requested and reviewed from July 2019 through July 2021. The highest combined VOC and acetone emission occurred during the 12-month rolling time period ending in December 2019, when 0.73 tons of combined VOC and acetone was emitted which is within the permitted limit.

This emission unit was observed during the site inspection. A water curtain system was observed installed for this emission unit. **EUSTAIN** utilizes high-volume low-pressure spray (HVLP) technology with test caps available for pressure testing. Test caps were noted to be available during the facility tour. Coating materials for **EUSTAIN** were captured and stored properly. Waste materials appeared to be disposed of properly. Per SC.V.1, NBHX Trim shall determine the VOC content for each stain utilizing Test Method 24 or upon request utilize manufacturer's formulation data. At the time of the inspection, NBHX Trim had completed Method 24 testing for several of the coatings used by the facility on February 27, 2019. NBHX Trim appeared to be using the results of the Method 24 testing data to determine VOC emissions. NBHX Trim had historically requested to utilize manufacturer's formulation data. However, due to difficulties in getting manufacturer's formulation data from an overseas supplier, NBHX Trim instead utilizes worst-case scenarios from Material Safety Data Sheets (MSDSs) to calculate emissions for the remaining coating materials used in **EUSTAIN** that did not have Method 24 testing completed.

Per SC.VI.3 (a-d), NBHX Trim shall keep track of usage rates for each stain, purge and clean-up material used, VOC and acetone contents, and VOC and acetone emissions per a monthly / 12-month rolling time period. Based a review of the records requested and reviewed, NBHX Trim is keeping track of applicable records.

Three stacks are associated with this emission unit and were observed during the inspection. The stacks were observed venting unobstructed vertically and appeared to be consistent with the listed values in the MI-ROP-N2614-2017a. No visible emissions were noted coming from the stacks

EUSTAIN is included in the MAP/PMP. Applicable records were requested for select time periods. After review of the records, NBHX appears to be following the MAP/PMP in place.

#### **EUMODELSHOP**

This emission unit consists of a manual bench-top spray booth used for touch-ups to wooden interior automotive parts with dry filter control. EUMODELSHOP is subject to an acetone emission limit of 4.0 tpy per a 12-month rolling time period. Records were requested and reviewed from July 2019 through July 2021. After reviewing the records provided, there were no acetone emissions from the materials used at EUMODELSHOP.

EUMODELSHOP is also subject to an hourly styrene emission limit of 0.73 pph and is also subject to a styrene content limit for all coating used. During the inspection Mr. Madden stated that no styrene containing materials are used in EUMODELSHOP and is also reflected in the facility's emission records.

EUMODELSHOP is subject to a coating material limit of 4,380 gallons per year per a 12-month rolling time period. Records were requested and reviewed from July 2019 through July 2021. The highest coating materials used occurred during the 12-month rolling time period ending in October 2019 when 113 gallons of coating material was used, which is within the permitted limit. The highest monthly coating materials used occurred during the month of July 2019 when 57.3 gallons of coating materials was used.

This emission unit was observed during the site inspection. During the facility tour containers of waste coatings / cleanup solvents were properly closed and stored. It was also noted that NBHX Trim is keeping containers closed when not in use in order to limit the amount of fugitive emissions. EUMODELSHOP utilizes dry filters to limit emissions from this spray booth. It was noted during the facility tour that dry filters were in place and air gaps were minimized. Spent filters appear to be adequately disposed of. The spray booth appeared to be operating satisfactorily. The booth also utilizes high-volume low-pressure (HVLP) spray technology with test caps available for pressure testing. Test caps were noted to be available during the facility tour.

Per SC.VI.3 (a-d), NBHX shall keep track of usage rates of acetone containing materials, acetone contents for materials used, and acetone emissions per a monthly / 12-month rolling time period. Based on the records requested and reviewed, NBHX appears to be keeping track of the required records.

Per SC.VI.4 (a-c), NBHX shall keep track of usage rates of coating materials and reclaimed (if applicable), and total usage rates per a monthly / 12-month rolling time period. No reclaim of materials is completed for EUMODELSHOP. NBHX Trim is keeping track of applicable records.

One stack is associated with this emission unit and was observed during the inspection. The stack was observed venting unobstructed vertically and appeared to

be consistent with the listed values in the MI-ROP-N2614-2017a. No visible emissions were noted coming from the stacks

#### **EUPUR / EUPUR2**

These two emission units are for the resin injection mold applications of a topcoat for wooden interior automotive parts. EUPUR and EUPUR2 are both subject to the VOC emission limits of 11.7 tpy and 12.7 tpy respectively per a 12-month rolling time period. Records were requested and reviewed from July 2019 through July 2021. Based on the records reviewed, NBHX Trim is using the stricter limit of 11.7 tpy for both emission units combined. The highest 12-month rolling VOC emissions for EUPUR and EUPUR2 occurred during the 12-month period ending in October 2019 when 0.66 tons of VOC were emitted, which is within the permitted limit. The highest monthly VOC emission occurred during the month of August 2019 when 235.1 pounds of VOC were emitted.

Both EUPUR and EUPUR2 are subject to a material limit of 10 percent VOC as received for the non-reactive portion of the lacquer resin. Additionally, both emission units are subject to a VOC material limit for the mold release material of 6.1 lb VOC/gal minus water as applied and 5.07 lb VOC/gal minus water as applied for EUPUR and EUPUR2 respectively. Since emissions are combined in the records provided, the more stringent value was used to verify compliance for both emission units. Records were requested and reviewed from July 2019 through July 2021. Upon initial review, the VOC content of the non-reactive portion of the lacquer resin was 13.7 percent which is over the permitted limit of 10 percent by weight. This was brought to the attention of Mr. Madden. Mr. Madden explained that the 13.7 percent value was in error from the Method 24 test results completed on February 27, 2019, due to the fact that water was not separated from the volatiles. A sample was submitted for Method 24 testing and the results showed the VOC content of the non-reactive portion of the lacquer resin to be 7.19 percent which is within the permitted limit. Records for the VOC content of the mold release show a 3.3 % by weight VOC content, which calculates to 0.28 lbs/gal (minus water) as applied which is within the permitted limit of 5.07 lbs/gal minus water. Method 24 test results were also provided verifying this.

Both emission units were observed during the site inspection. NBHX Trim is limiting open containers when not in use in order to limit fugitive emissions. NBHX Trim is keeping coatings, waste containers of waste coatings, curing agents, mold release materials and cleanup solvents properly closed and stored.

Per SC.V.1 the VOC content for all coatings, curing agents, mold release materials and cleanup solvents shall be determined by Test Method 24. Alternatively, and upon written approval by the AQD District Supervisor, NBHX Trim may utilize manufacturer's formulation data. Additionally, random Method 24 testing shall be completed yearly with all coatings tested in a five-year period. At the time of the inspection, Method 24 testing had been completed for the materials used in EUPUR/EUPUR2.

Per SC.VI.3. a-d, NBHX Trim shall keep monthly records for EUPUR and EUPUR2 of usage rates of each lacquer resin, mold release and cleanup solvent, VOC content, and VOC emissions per a monthly / 12-month rolling time period. NBHX Trim is keeping track of applicable records for EUPUR / EUPUR2.

Two stacks are associated with EUPUR and EUPUR2 respectively and were observed during the inspection. The stacks were observed venting unobstructed vertically and appeared to be consistent with the listed values in the MI-ROP-N2614-2017a. No visible emissions were noted coming from the stacks

#### **EUBOILER-A**

This emission unit is for the natural gas boiler with a rated capacity of 10.5 MMBTU/hr installed in 1990. EUBOILER-A is subject to a VOC limit of 0.06 pounds per hour (pph) per a 24-hour rolling time period and a second VOC limit of 0.26 tpy per a 12-month rolling time period. Records were requested and reviewed from July 2019 through July 2021. During the review of the records, it was noted that NBHX Trim is combining natural gas usage for both boilers when calculating VOC emissions. The highest 12-month rolling VOC emission for the combined boilers occurred during the 12-month periods ending in October 2019, December 2019, and January 2020 when 0.08 ton of VOC was emitted. The highest calculated VOC emission rate was noted to be 0.050 lbs/hr during the month of November 2020, which is within the permitted limit.

During the inspection EUBOILER-A was observed. It was verified by NBHX Trim staff that the boiler only uses natural gas and is also reflected in the logs. The boiler plate for EUBOILER-A was also observed and was noted to be consistent with the rated capacity listed in MI-ROP-N2614-2017a. Per SC.VI.2. a-b, NBHX Trim shall keep records of the VOC calculations used to determine the pounds per hour emission rate and the total VOC emissions per a 12-month rolling time period. NBHX is keeping track of all applicable records.

One stack is associated with this emission unit and was observed during the inspection. The stack was observed venting unobstructed vertically appeared to be consistent with the listed values in MI-ROP-N2614-2017a.

EUBOILER-A is subject to the New Source Performance Standards (NSPS) Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Based on records provided, NBHX Trim is keeping track of their daily natural gas usages. An initial notification for EUBOILER-A was submitted on December 23, 2019, after a copy could not be found during a previous inspection.

#### **EUBOILER-C**

This emission unit is for a natural gas boiler with a rated capacity of 12.0 MMBTU/hr installed in 2015. EUBOILER-C was observed during the inspection and was verified by NBHX staff to utilize only natural gas. EUBOILER-C is subject to the NSPS Subpart Dc regulations. An initial notification for EUBOILER-C was received on May30, 2017. NBHX Trim is keeping track of natural gas usages. NBHX Trim appears to be in compliance with NSPS Subpart Dc rules.

#### **FGBOILERMACTA**

NBHX Trim is a major source of HAPs and is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart DDDDD – Industrial, Commercial, and Institutional Boilers and Process Heaters. This section is

specifically for EUBOILER-A. This boiler only utilizes natural gas. An Initial Notification Report was submitted for this boiler in 2005. An Energy Assessment for this boiler was completed on July 19, 2017. Based on the size of the boiler, it is required to have annual tune ups with reports submitted to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI) and to the AQD. Since the last inspection, a tune up was completed on August 3, 2021. An email sent to NBHX staff on August 25, 2021, requested that the facility submit the tune up reports and initial notification of Subpart DDDDD officially to the EPA as well as a hard copy to the Grand Rapids AQD District Office. NBHX staff stated that they were working on submitting the tune up reports for EUBOILER-A through CEDRI to the EPA in an email dated August 27, 2021. These reports were submitted to AQD on September 13, 2021.

#### **FGBOILERMACTC**

NBHX is a major source of HAPs and is subject to the NESHAP Subpart DDDDD. This section is specifically for EUBOILER-C. As stated previously, this boiler only utilizes natural gas. Based on the size of the boiler, it is required to have annual tune ups with reports submitted to the EPA via CEDRI and to the AQD. Since the last inspection, a tune up was completed on September 9, 2020, and August 3, 2021. NBHX staff stated in an email dated August 18, 2021, that EUBOILER-C ran for much of the 2020 calendar year and were unable to complete a tune up for 2020. An email sent to NBHX staff on August 25, 2021, requested that the facility submit the tune up reports and initial notification of Subpart DDDDD officially to the EPA as well as a hard copy to the Grand Rapids AQD District Office. Additionally, following the inspection, NBHX staff stated in an email dated August 27, 2021, that they were working on submitting the tune up reports for EUBOILER-C through CEDRI to the EPA as well as the initial notification for Subpart DDDDD to the Grand Rapids District Office. These reports were submitted to AQD on September 13, 2021.

#### **FGRTO**

This flexible group is for the spray application of a polyurethane sealer/isolator or polyester coatings in a water wash enclosure controlled by a regenerative thermal oxidizer (RTO) with associated uncontrolled flash-off areas, flash-off tunnels, drying areas, and racking/staging areas that is subject to Compliance Assurance Monitoring (CAM) rules. Emission units included in this flexible group are EUPOLYU, EUPOLYESTER-A, and EUPOLYESTER-B.

This flexible group is subject to a VOC emission limit of 48.36 tpy per a 12-month rolling time period. This flexible group is also subject to a styrene hourly emission limit of 11.00 pph. Records were requested and reviewed from July 2019 through July 2021. The highest 12-month rolling VOC emission occurred during the 12-month period ending in October 2019 when 14.72 tons of VOC was emitted. The highest monthly VOC emission occurred during the month of September 2020 when 2.314 tons of VOC was emitted. The highest styrene emission rate was 0.12 lbs/hr for the months of June 2020, August 2020, and February 2021 which is within the permitted limit.

This flexible group was observed during the inspection. A water wash system was observed in place. Purge waste coatings and solvents appeared to be closed and stored properly. The spray booths for FGRT0 utilize high-volume low-pressure spray (HVLP) applicators. Test caps were noted to be available for pressure testing. The RTO was not in operation at the time of the inspection. NBHX Trim is recording the static pressure on the opposite side of the fan that pulls emissions into the capture system so a positive reading will indicate satisfactory operation of the capture system. The most recent RTO destruction efficiency test was on May 24-25, 2016. During testing the RTO destruction efficiency was determined to be 98.05% and the capture efficiency of the capture system was 92.39%. Per SC.V.1, NBHX Trim has five years upon the issuance of MI-ROP-N2614-2017a to complete stack testing to verify the capture and destruction efficiency of the RTO.

Per SC.V.5, VOC content for all coatings used in this flexible group shall be determined by Test Method 24. Alternatively, and upon written approval by the AQD District Supervisor, NBHX Trim can instead request to utilize manufacturer's formulation data. NBHX had previously requested to utilize manufacturer's formulation data to determine the VOC contents of materials used. However, due to difficulties in getting manufacturer's formulation data from an overseas supplier, NBHX instead utilizes worst-case scenarios from MSDS to calculate emissions. At the time of the inspection, NBHX Trim had completed Method 24 testing for several of the coatings used by the facility on February 27, 2019, and MSDS appeared to be used for the remaining materials not Method 24 tested in calculating VOC emissions. When comparing the results from the Method 24 testing and MSDS to emissions calculated several errors were noted in the records. These were brought to the attention of NBHX Trim staff and responses for each potential issue were received. Minor errors were still noted but overall, the VOC contents noted in select materials were concluded to be acceptable.

At the time of the inspection temperature records were observed being recorded via a circular chart and an LCD monitor for the temperature of the combustion chamber and static pressure of the capture system. NBHX Trim is required to continuously keep temperature records of the RTO combustion chamber in order to demonstrate compliance. Temperature records for the RTO combustion chamber were requested and reviewed for select months. After a review of the records the RTO appears to be operating normally.

Per SC.VI.3 NBHX Trim shall once on a daily basis record the temperature of the LCD temperature monitor and compare it to the recorded temperature on the chart recorder. Daily records were requested for select months and reviewed. Based on the records reviewed, NBHX Trim is recording daily records of the RTO temperature. Per SC.VI.4-7, NBHX Trim is subject to various inspection requirements in order to maintain compliance of the RTO. Records were requested for select time periods and provided. Based on the records reviewed, it appears NBHX Trim is completing appropriate inspections of the RTO.

An LCD monitor displaying the capture system static pressure was noted during the inspection. Per SC.VI.9, NBHX Trim shall record the static pressure for the capture system on a once per shift basis or more frequently. Daily records were requested for select time periods and reviewed. Based on the records reviewed, it appears that NBHX is adequately keeping track of the daily static pressure drops for the capture system. Per SC.VI.10-14, NBHX Trim is subject to various inspection requirements to

maintain compliance of the capture system. Inspection records were requested for select time periods and provided. Based on the records reviewed, NBHX Trim appeared to overall be completing the appropriate inspections of the capture system.

Based on the records reviewed, NBHX Trim appears to be keeping track of usages, appropriate material contents, hourly styrene emission rates and monthly/12-month rolling time period VOC and acetone emissions. It was noted that this is the only area that reclaim of materials is completed.

Nine stacks are associated with FGRT0. The exact number and locations of each stack could not be identified, and it was verified following the inspection by NBHX staff that several stacks have been removed and they only appear to be in operation with four of the nine stacks. Moving forward, it will be discussed with NBHX staff on updating MI-ROP-N2614-2017a to accurately reflect the current stacks and appropriate dimensions.

The RTO is included in the MAP/PMP and includes various items in daily, weekly, monthly quarterly, and annual inspections. As stated previously, inspection records for the RTO and capture system were requested for select time periods and provided. Based on the records reviewed, it appears that NBHX Trim is overall following the MAP/PMP for the RTO and capture system.

#### FGDUST

This flexible group is for the six dust collectors which serve various wood working operations within the facility. The dust collectors are split into two separate groups (EUWESTDUSTSYSTEM & EUEASTDUSTSYSTEM) with three dust collectors for each group. FGDUST is also subject to CAM and is discussed further below. FGDUST is subject to several particulate matter (PM) emission limits that are as follows:

Pollutant	Limit	Time Period/Operating Scenario	Equipment
PM	0.01 lbs/1000 lbs of exhaust gases	Instantaneous	Each duct collector
PM10	1.37 pounds per hour	Hourly	Dust collector 6
PM10	2.57 pounds per hour	Hourly	Dust collector 5
PM10	2.83 pounds per hour	Hourly	Dust collectors 2 and 3 individually
PM10	1.68 pounds per hour	Hourly	Dust collectors 1 and 4 individually

Magnehelic gauges were observed for 5 of the 6 dust collectors, however the dust collectors and associated processes were not in operation during the inspection. During the previous inspection it was stated by NBHX Trim staff that dust collector 6E has not been in operation since at least July 1999 and it was concluded to still not be in operation during the inspection. Additionally, this unit does not have a magnehelic gauge

Daily pressure drops and opacity observation records were requested and provided by NBHX Trim staff for the time period of July 2019 through July 2021. The records of opacity observations were reviewed, and it was noted that no opacity was observed during the facility's observations. Per MI-ROP-N2614-2017a, the indicator range for the pressure drop readings indicating satisfactory operation is 1" – 5" of water column (w.c.). Upon review of the records provided, each dust collector had several excursions. Dust Collector 1 had a total of 102 excursions which were below the required pressure drop range. Dust Collector 2 had 64 excursions below the required pressure drop range. Dust Collector 3 had a total of 52 excursions below the required pressure drop range. Dust Collector 4 had a total of 89 excursions below the pressure drop range. Dust Collector 5 had 9 excursions below the pressure drop range and 15 excursions above the pressure drop range. NBHX Trim staff stated that pressure gauges that measure the static pressure drop are calibrated annually. In an email dated August 18, 2021, NBHX staff stated that due to a drop in production the dust collectors aren't maintaining the proper pressure drop. Also, NBHX staff stated in the August 18, 2021, email that the pressure drops for Dust Collector 5 above the specified pressure drop range were due to a bad air valve discovered at the top of the Dust Collector tower. This issue was resolved as soon as possible due to weather conditions, which took two weeks by a third party, Constructive Sheet Metal. Based on the records reviewed, the five baghouses appear to be out of compliance per SC III. 1 and SC VI.7. NBHX Trim appears to not be adequately following the CAM plan or properly operating the baghouses.

Six stacks are associated with FGDUST and were observed during the inspection. The stacks were observed venting unobstructed vertically and appeared to be consistent with the listed values in the MI-ROP-N2614-2017a.

FGDUST is included in the MAP/PMP and weekly inspections for various items are to be completed. Records were requested for select time periods and provided. Based on the records reviewed, it appears that NBHX is adequately following the MAP/PMP for FGDUST.

#### **FGRULE287(2)(c)**

**Glue Membrane Booth** - One glue membrane booth was observed. In this booth glue is sprayed onto wood parts before applying a veneer to seal the parts together. The booth was not in operation at the time of the inspection. The dry filters were in place and appeared to be in good condition. Monthly records were requested and reviewed from July 2019 through July 2021. The highest usage from the glue membrane booth for the time period of July 2019 through July 2021 occurred during the month of November 2019 when 70 gallons of material was used. Based on the records reviewed and observations made, this booth appears to be exempt per Rule 287(2)(c).

**EUEDGEPAINT** – NBHX Trim has one edge painting booth that was observed during the inspection. Additionally, plant-wide wipe solvent usage (IPA & MIBK) is included in these records. The dry filters were in place and appeared to be in good condition. Monthly records were requested and reviewed from July 2019 through July 2021. The highest usage from the edge painting booth for the time period of July 19 through July 2021 occurred during the month of January 2020 when 98.6 gallons of material was used. Based on the records reviewed and observations made, this booth appears to be exempt per Rule 287(2)(c).

**EUAIRBRUSH** – NBHX Trim utilizes two air brush booths that were observed during the inspection. The dry filters were in place and appeared to be in good condition. Monthly records were requested and reviewed from July 2019 through July 2021. The highest usage from the air brush booths for the time period of July 19 through July 2021 occurred during the month of September 2020 when 86.3 gallons of material was used. Based on the records reviewed and observations made, this booth appears to be exempt per Rule 287(2)(c).

#### **FGRULE290**

The open pore process area utilizes the Rule 290 exemption. A water wash system was observed in place for this part of the process. No open containers not in use were observed for this emission unit. Records were requested and reviewed for the time period of July 2019 through July 2021. The highest emissions from the open pore process for the time period covered by this inspection occurred during the month of October 2019 when 321.1 lbs of controlled non-carcinogenic VOC emissions and 1.8 lbs of controlled carcinogenic VOC emissions. These emissions are within the Rule 290 limits. The carcinogenic emissions are only from ethylbenzene identified in a sealer material. Based on the records reviewed and observations made, it appears the open pore process area is exempt per Rule 290.

#### **FGCOLDCLEANERS**

One parts washer was observed during the inspection. The parts washer was empty, labeled and closed at the time of the inspection. Based on the observations made the parts washer appears to be exempt per Rule 281(2)(h).

#### **Conclusion**

Based on the facility walkthrough, observations made, and records reviewed, NBHX Trim appears to be in out of compliance with Renewable Operating Permit (ROP) No. MI-ROP-N2614-2017a, specifically Special Condition III. 3. and Special Condition VI.7. as it relates to FGDUST.

NAME Michael T. Cox

DATE 9/16/2021

SUPERVISOR HH