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

N261466754

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:** 02/14/2023
STAFF: Michael Cox	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled Unannounced Inspection		
RESOLVED COMPLAINTS:		

On February 14, 2023, 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 and to determine the facility's operating status. MTC arrived on site at approximately 1:30pm and contacted Mr. Dan Madden to conduct the 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. 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. Since the last inspection, the facility is in the process of closure. Mr. Madden stated that production for this facility had ended in December 2022.

Compliance Evaluation

EUBLEACHBOOTH

This emission unit consisted of a manual spray application of an aqueous solution of inorganic bleaching materials in a water wash spray booth and associated drying tunnel. EUBLEACHBOOTH was observed to have been removed during the site inspection. 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 for the time period of January through December 2022. NBHX Trim historically utilized only one hydrogen peroxide containing material for this emission unit that is 30% hydrogen peroxide. EUBLEACHBOOH appeared to only operate during the month of December 2022. The pounds per hour emission rate based on monthly total hydrogen peroxide emissions and operating hours was noted to be 0.05 pph for the month of December 2022, which is within the permitted limit. For the month of December 2022, 41.1 lbs of hydrogen peroxide was emitted. The highest hydrogen peroxide emission occurred during the 12-month rolling time period

ending in December 2022 when 0.02 tpy of hydrogen peroxide was emitted which is within the permitted limit.

EUSTAIN

This emission unit consisted of a spray application of wood stain in three spray booths and associated drying room. EUSTAIN was noted to have been dismantled and removed from the facility during the site visit. 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 January through December 2022. The highest combined VOC and acetone emission occurred during the 12-month rolling time periods ending in November and December 2022, when 0.16 tons of combined VOC and acetone was emitted which is within the permitted limit.

EUMODELSHOP

This emission unit consisted of a manual bench-top spray booth used for touch-ups to wooden interior automotive parts with dry filter control. EUMODELSHOP was noted to be removed from the facility during the site visit. 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 January through December 2022. After reviewing the records provided, there were no acetone emissions from the materials used at EUMODELSHOP.

EUMODELSHOP is 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 were used in EUMODELSHOP, which 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 January through December 2022. The highest coating materials used occurred during the 12-month rolling time period ending in January 2022 when 4 gallons of coating material was used, which is within the permitted limit. The highest monthly coating materials used occurred during the month of February 2021 when 1.6 gallons of coating materials was used.

EUPUR / EUPUR2

These two emission units were for the resin injection mold applications of a topcoat for wooden interior automotive parts. EUPUR and EUPUR2 were both removed from the facility during the site visit. 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 January through December 2022. Based on the records reviewed, NBHX Trim is using the stricter limit of 11.7 tpy for both emission units combined. After further review, it appears that neither emission unit operated during the time frame covered by this inspection as all emission were recorded as 0.

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. Records were requested and reviewed from January through December 2022. As stated earlier, neither emission unit appeared to operate during the time period covered by this inspection.

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 August, September, and October 2022 when 0.07 ton of VOC was emitted. The highest calculated VOC emission rate was noted to be 0.056 lbs/hr during the month of February 2022, 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 May 30, 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 in August 2022.

FGBOILERMACTC

NBHX is a major source of HAPs and is subject to the NESHAP Subpart DDDDD. This section is specifically for EUBOILER-C. The initial notification for Subpart DDDDD was submitted to AQD on September 13, 2021, due to a previous inspection. 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. Due to the facility closing, the tune-up records were not able to be provided or reviewed.

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. EUPOLYU, EUPOLYESTER-A, and EUPOLYESTER-B were noted to be in the process of being dismantled and removed from the facility during the site visit. The RTO was noted to still be on site but is also slated for dismantling and removal.

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 January through December 2022. The highest 12-month rolling VOC emission occurred during the 12-month period ending in February 2022 when 2.51 tons of VOC was emitted. The highest monthly VOC emission occurred during the month of October 2022 when 815 pounds of VOC was emitted. The highest styrene emission rate was 0.15 lbs/hr for the month of November 2022, which is within the permitted limit.

Required destruction efficiency and capture efficiency testing was conducted on the RTO on June 28, 2022, and again on August 9, 2022. The June 28, 2022, stack test resulted in a violation notice for failure to meet the minimum required destruction efficiency of 95%. The second stack test conducted on August 9, 2022, resulted in a second violation notice for a failed stack test due to the average of three (3) test runs being below the minimum 95% destruction efficiency. Based on the facility closure and the active dismantling of the RTO these violation notices can be resolved.

FGDUST

This flexible group is for the six dust collectors which served 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. It was noted that EUEASTDUSTSYTEM had been dismantled and removed from the building and staged in the facility parking lot for shipment offsite. EUWESTDUSTSYTEM was actively being dismantled and removed from the building during the site visit.

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

Records for this flexible were not able to be obtained or reviewed for this inspection due to the facility closure.

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 and was in the process of being dismantled. Monthly records were requested and reviewed from January through December 2022. The highest monthly usage from the glue membrane booth for the time period of January through December 2022 occurred during the month of June 2022 when 42.1 gallons of material was used. Based on the records reviewed and observations made, this booth appeared to be exempt per Rule 287(2)(c).

EUEDGEPAINT – NBHX Trim has one edge panting booth that was observed during the inspection. Additionally, plant-wide wipe solvent usage (IPA & MIBK) is included in these records. The booth was not in operation at the time of the inspection and was in the process of being dismantled. Monthly records were requested and reviewed from January through December 2022. The highest monthly usage from the

edge painting booth for the time period of January through December 2022 occurred during the month of October 2022 when 106.5 gallons of material was used. Based on the records reviewed and observations made, this booth appeared to be exempt per Rule 287(2)(c).

EUAIRBRUSH – NBHX Trim utilizes two air brush booths that were observed during the inspection. The booth was not in operation at the time of the inspection and was in the process of being dismantled. Monthly records were requested and reviewed from January through December 2022. The highest usage from the air brush booths for the time period of January through December 2022 occurred during the month of September 2022 when 72 gallons of material was used. Based on the records reviewed and observations made, this booth appeared to be exempt per Rule 287(2)(c).

FGRULE290

The open pore process area utilizes the Rule 290 exemption. The open pore process was not in operation at the time of the inspection and was in the process of being dismantled. Records were requested and reviewed for the time period of January through December 2022. The highest monthly emission from the open pore process for the time period covered by this inspection occurred during the month of September 2022 when 190.5 lbs of controlled non-carcinogenic VOC emissions and 1.3 lbs of controlled carcinogenic VOC emissions. These emissions are within the Rule 290 limits. The carcinogenic emissions are from ethylbenzene identified in a sealer material. Based on the records reviewed, the open pore process area appeared to be exempt per Rule 290.

FGCOLDCLEANERS

One parts washer was historically onsite. The parts washer appeared to have been removed from the facility during the walkthrough.

Conclusion

Based on the facility walkthrough, observations made, and records reviewed, NBHX Trim appears to be in compliance with Renewable Operating Permit (ROP) No. MI-ROP-N2614-2017a and all other applicable State and Federal air pollution rules and regulations. A "Void Request" for the ROP renewal application and for ROP No. MI-ROP-N2614-2017a has not yet been received by the Grand Rapids District Office but is expected to be submitted shortly. The facility is no longer in operation and all the process equipment, including control devices have been either removed from the facility or are in the process of being removed. This facility can now be considered permanently closed.

NAME Michael T. Cox DATE 3/23/2023 SUPERVISOR HH