

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

N528243275

FACILITY: Fiber-Tech Industries, Inc.		SRN / ID: N5282
LOCATION: 1637 Marty Paul Street, CADILLAC		DISTRICT: Cadillac
CITY: CADILLAC		COUNTY: WEXFORD
CONTACT: Gary Bigger, Plant Manager		ACTIVITY DATE: 02/07/2018
STAFF: Bill Rogers	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On February 7, 2017, I inspected Fiber-Tech Industries in Cadillac. This facility suspended operations in July, 2009. The company has kept their Renewable Operating Permit active because they hope to return this facility to operation when the market improves.

In my 2015 inspection I found one minor violation. Permit conditions require the spray booths to exhaust unobstructed vertically upward, but one of them has a stack cap which prevents this. This has not changed since my previous inspection. As the plant is not operating and no exhaust is being discharged, this violation is not strictly speaking ongoing, so I will not start enforcement action about it. After my previous inspection I notified Fiber Tech that the spray booth stack didn't meet permit conditions and told them that they should do something to address this if the plant ever returns to operation.

Mr. Gary Bigger showed me around during my on-site inspection. Mr. Michael Caskey of Fiber Tech in Ohio provided me copies of facility records to review for compliance with permit conditions.

Since the last inspection, Fiber Tech received a renewal of their ROP. The permit is now ROP MI-ROP-N5282-2018. Conditions have not changed much since the earlier -2012 version.

Renewable Operating Permit MI-ROP-N5282-2018, Table FGRECIPROCATING, Condition I.4, limits acetone emissions to 9.2 tons per year. According to records supplied by Mr. Caskey, the facility used 251 pounds of acetone last year. This complies with the emission limit.

Mr. Bigger explained to me that although the facility is shut down, they still use a small amount of acetone to clean the equipment. He showed me the storage can of acetone available for current use. It was closed tightly, although there was a slight odor of acetone near it.

Conditions I.1 through 3 and I.5 through I.15 contain many emission limits based on use of gel coat and resin. As the facility is not currently using any gel coat and resin, the facility has no emissions from them. This complies with the emission limits.

Conditions II.1 through II.7 contain material usage limits on gel coat and resin. As the facility has not used any, it is in compliance with these limits.

Condition III.1 requires that FGRECIPROCATING should not operate unless the exhaust filters are installed and operating properly. The exhaust filters were not in place on the three spray booths of this flexible group at the time of my inspection. This was not a violation because the equipment is not operating. Therefore the facility is in compliance with this permit condition.

Condition III.2 requires an impervious film be applied to the wet surface of the mold as soon as possible after the application of each layer of resin. This condition is not applicable when the facility is not applying any resin. Mr. Bigger explained that they would lay Mylar film across the wet surface of gel coat and resin on the panels they manufactured, in order to confine the solvents in the resins to the piece they were building. Then the styrene gets consumed and bound up in the material, as it should be. They would then peel the Mylar film off and reuse it.

Condition III.4 requires keeping tanks, transfer totes, and containers for gel coat and resin closed or covered except when adding or removing materials. All the solvent containers I saw during the inspection were closed or covered.

Conditions VI.1 through VI.6 and VI.10 require keeping records of resin and gel coat usage, their styrene and organic HAP content, and styrene and organic HAP emissions. Mr. Caskey provided me with a copy of the spreadsheet they would use to record this information. It appeared to be adequate to satisfy the

permit conditions. However, this is moot since none of these materials have been used in the past several years.

Condition VI.7 requires keeping track of acetone used per month. Mr. Caskey provided me with acetone use records. Total acetone use for 2017 was 251 pounds.

Condition VI.8 requires keeping track of acetone sent offsite for recycling or disposal. Mr. Bigger told me that the company is not using enough acetone to send it offsite for recycling or disposal at this time. Therefore they sent none offsite during 2017.

Condition VI.9 requires calculating acetone emissions. Mr. Caskey provided me with this information. Fiber-Tech simply assumes that any acetone they use is an air emission; they used 251 pounds, so they had 251 pounds of emissions. There is nowhere else for the acetone to go, so this is a reasonable assumption.

Condition VII.1 requires prompt reporting of any deviations. As the facility is within limits on acetone usage and is not operating otherwise, there are no deviations.

Condition VII.2 and VII.3 require annual and semiannual certifications and deviation reports. The company submitted these reports for 2017. The semi-annual report for the second half of 2017 and the 2017 annual certification arrived January 23, 2018. This is on time. AQD accepted them as correct and properly certified. The first-half 2017 semiannual report arrived July 17, 2018. This is on time. AQD accepted this report as correct and properly certified.

Condition VII.4 requires a semiannual report for compliance with 40 CFR 63, subpart WWWW. These reports were included with the semiannual and annual deviation reports and certifications. The AQD accepted these reports as correct and properly certified.

Condition VIII.1, 2, and 3 set stack dimensions for the three spray booths in the facility. Two of these are 18 inches in diameter and one 34 inches in diameter; all three have a minimum height of 40 feet above ground level. The stacks appeared to be of about the proper dimensions, although I was not able to estimate their height with any precision.

The permit conditions require that the stacks exhaust unobstructed vertically upward. As noted during my previous inspection, the stack farthest to the west, along the rear wall of the facility, did not appear to meet this condition, as it appears to have a cone-shaped cap; the other two stacks have no-loss caps. We have notified Fiber-Tech of this discrepancy.

Documents provided by the company state that the spray booths have not operated in several years. I saw no evidence that they had operated recently. The booths themselves and the spray equipment appeared to be in good condition.

NAME William J Rogers, Jr.

DATE 2/9/2017

SUPERVISOR 