

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

N680343825

FACILITY: Dayco Products LLC		SRN / ID: N6803
LOCATION: 1799 Gover Parkway, MOUNT PLEASNT		DISTRICT: Saginaw Bay
CITY: MOUNT PLEASNT		COUNTY: ISABELLA
CONTACT:		ACTIVITY DATE: 03/07/2018
STAFF: Benjamin Witkopp	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Facility inspection - General coating permit and HAPs opt-out		
RESOLVED COMPLAINTS:		

Ben Witkopp of the Michigan Department of Environmental Quality - Air Quality Division (MDEQ-AQD) met with David Milbourne of Dayco. David is responsible for Environmental, Health, and Safety at the facility. Previously, the facility was part of Metavation but Dayco purchased it through Bankruptcy Court. The site has a "General Coating Line" permit 3-05 and a hazardous air pollutants (HAP's) opt-out permit 20-00C.

The facility makes metal vibration dampening parts for automotive engines. In the past, the facility basically consisted of a number of spray operations and lines were designated as either weightbond or finish coat. Weightbond used solvent based adhesives and the finish coat used waterbased. David said usage / production is down though it is still a two shift operation. He confirmed the type of coatings remained the same as in the past.

We went into the facility. Very little activity was occurring. The first stop was at the east end of the facility which David indicated was finish coat 2. It was not in use at the time but the required filters were in place.

We then went back to the west side and the first stop there was designated Gen V and a finish coat per David. Just east of there was an operation called Multiline which was also a finish coat. Both lines had filters in place. East of there was finish coat 7 which down due to lack of business. It was having maintenance performed.

The description of the lines seemed odd as no lines were apparently designated for weightbond though David initially said the type of coatings remained the same as in the past. When I pointed this out, David said weightbonds were indeed all gone.

When I asked for records required by the permits David was unable to produce anything. He did show me some small pieces of paper with some coating designations on them which were apparently daily production orders for employees, though even that was unclear. I asked if there was someone else capable of providing records. I was subsequently provided the contact info for Jim Piasecki from Dayco's corporate office.

I contacted Jim and requested records for 2017 and 2018 which were required by the permits. Jim provided records such as they were. There weren't any 12 month rolling totals for volatile organic compounds (VOC's) or HAP's and the equipment designations didn't match with the on site information provided by David. Jim apologized and said David was relatively new. I told him the info onsite was also confirmed through labeled booth designation.

I later received another set of records and David said finish coat 2 is called Pentastar, finish coat 6 and weightbond 1 are called Multiline, and finishcoat 10 is called Gen V. Finishcoat 7 remains as the most recent to be out of service. In the records finish coat 2 was now called Phoenix. Having only somewhat cleared up the line designation, the next problem was the records themselves. The records were presenting 12 month averages rather than the required 12 month rolling totals. There weren't any records of the individual HAP's based upon a 12 month rolling time period. After a few more attempts records for VOC's and total HAP's which possibly reflect operations were provided though units for some values were absent.

The records required for the individual line usages and resulting emissions clearly had spreadsheet

problems etc but nothing that couldn't be rectified in the future. Individual HAP 12 month rolling totals continued to be absent. The good news was that the levels of emissions shown for the entire facility indicated there weren't problems for an individual line or for HAP's. Should the record keeping issues remain unaddressed, a future violation notice would be warranted.

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Update end of June 2018 - Michigan Air Emissions Reporting System (MAERS)

The facility submittal was poor at best. The submittal failed to realize the throughput units were to be in tons and reported what appeared to be gallons. This resulted in huge (incorrect) amounts of emissions. The submittal had an attachment for documentation but it didn't even have info for 2016 let alone 2017. After several discussions with David I ended up doing calculations and changing input values myself. I then used MAERS emission factors as the basis for the resulting emissions. This was done with concurrence from David.

NAME B. Z...

DATE 9-27-18

SUPERVISOR C. ...