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

N741367233

FACILITY: VENTRA FOWLERVILLE LLC		**SRN / ID:** N7413
LOCATION: 8887 WEST GRAND RIVER AVENUE, FOWLERVILLE		**DISTRICT:** Lansing
CITY: FOWLERVILLE		**COUNTY:** LIVINGSTON
CONTACT: Evan Urbanski , EHS Manager		**ACTIVITY DATE:** 02/16/2023
STAFF: Robert Byrnes	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: FY 23 Scheduled Inspection.		
RESOLVED COMPLAINTS:		

On February 16, 2023 David Rauch and I conducted an unannounced inspection at the Flex-N -Gate (Ventra) Fowlerville facility. I arrived at the facility and asked to meet with Evan Urbanski, the Environmental health & Safety Manager for the facility. The facility is a major source of VOC and is covered by MI-ROP-N7413-2020. The facility produces (molds) plastic truck/automobile bumper facia's, paints the parts and then assembles the parts as necessary.

EU-PIM

EU-PIM was identified in PTI 247-04 listing 6 presses with no permit conditions for the EU. There are currently 10 (originally 6 permitted, then 8, and now currently the 10th press was installed in 2018) plastic molding machines which make front and rear bumper components for various vehicle models. The molding operations typically run 3 shifts per day, 5 days per week. The last 4 installed mold presses are likely exempt under Rule 286(2)(b). The facility has installed robots on 9 mold press lines to flame treat the parts with a natural gas fired torch. These additions are also likely exempt under Rule 282(2)(b)(i) or under the Rule 286(2) (b) exemption.

Additional plastic molding equipment was also installed under PTI 247-04, such as electrically heated dryers, 4 plastic pellet storage silo's (currently 6, last one recently installed in July 2017) and plastic recycling. Future installations of the plastic handling equipment could also be considered exempt under the following regulations if the records required in Rule 278 are maintained. Electrically heated air dryers for the plastic Resin portion of the molding process. The dryers are used to remove moisture from the molding process to eliminate quality concerns – R286(2)(a). Outdoor plastic resin storage silo's – exempt R286(2)(a). Bulk plastic resins are offloaded from semi-tankers using a vacuum system to transfer the materials. Scraped or ruined plastic bumper components are recycled through a plastic grinder to be ground up for re-pelletizing or paint stripped at a facility off-site – exempt R285(2)(l)(vi)(B).

There are also several bumper assembly lines which punch some holes and attach smaller plastic parts (lights, grills, sensors, brackets, license plate holders) which were likely installed after the main equipment from PTI 247-04- exempt R285(2)(l)(vi)(B). The assembly lines are typically operating 2 shifts per day, 5 days per week for various products. A future area was being prepared for a future installation of bumper assembly.

It was again mentioned to Evan that any additional equipment added beyond that of a PTI needed separate documentation for each new process showing the installation date, a description of the equipment installed, the exemption rule the equipment was installed under and a Rule 278 demonstration.

EU-WASHLINE

The paint system begins with a 5 stage aqueous based washer. The final stage uses reverse osmosis water. After the washer there is a convection dry-off oven with a 16 minute drying cycle at 225 degrees Fahrenheit. Next is a cool down process which lasts approximately 5 minutes with an end temperature target of 80 degrees Fahrenheit before paint application begins. Although EU-WASHLINE is identified in the ROP, there are no permit conditions for this emission unit.

FG-COATINGLINE

The start of the paint process begins with the application of an Adhesion Promoter (AP) which is solvent borne. There are 3 conventional robotic applicators within the adhesion promoter booth. After the AP booth there is a convection heated flash which drives off the solvent from the AP coating. EU-APPROCESS is ducted to the thermal oxidizer as required in ROP (via rolled in PTI 247-04B).

The basecoat booths spray a solvent borne color coating using 5 fully electrostatic robot bells and 3 dual head electrostatic robot applicators. The booth was designed for 80 ft/minute down draft and has a water wash particulate overspray control system. Following the basecoat booth is an 8-10 minute ambient flash area. Clear coat booths apply a solvent borne clear coat paint using 6 robotic applicators. All applicators are fully electrostatic bells which the original 5 had been tested by ABB when installed and provided approx. 47% TE. The clear coat booth was also designed for 80 ft/minute down draft and has a water wash particulate overspray control system. There is a 15 minute ambient flash followed by the bake oven. The bake oven has a 10 minute radiant heat section followed by a convection section. The total oven time is approximately 40 minutes with the design criteria being able to achieve a part curing temperature of 250-280 degrees Fahrenheit for 25 minutes.

Ad Pro and basecoat paints are received in 55 gallon drums filled with 45 gallons of paint, 10 gallons of room left for thinner. The clear coat comes in 150 gallons totes or larger due to the higher usages. A new contractor/vendor has been utilized for the paint sludge room. New paint pumps have been installed to cut down on clean up emissions.

The basecoat and clear coat spray booths are controlled by an new RTO (PTI 247-04C). The RTO is brought up to temperature 2 hours prior to production and has a conveyor/sprayers interlock which automatically shuts down if the temperature of the RTO falls below 1400 degrees Fahrenheit. The RTO is a 2 chamber design with a cycle time of approximately 2.5-3 minutes.

RTO temperature strip charts were obtained for January 3rd, 2023 through January 7th, 2023 and are included with this report. Other than a temperature drop over the weekend, the temperature was always well above 1400 degrees Fahrenheit. More commonly the RTO was operated around 1520-1540 degrees during all operating periods. The RTO was replaced in 2022. All details with the thermocouple replacement/calibration, heat exchanger media check, etc. was not records requested as the unit is new. Evan was not aware of any RTO bake outs being performed on the new unit.

The operating parameters for the RTO on the day of inspection were as follows:

Operating Temperature = 1642 degrees F (previous inspections were 1547, 1546, 1546)

The thermocouple was replaced on 3-16-2017

Inlet Temperature = 122 degrees F (previous inspections were 83, 99, 92)

Outlet Temperature = 314 degrees F (previous inspections were 280, 297)

Pressure Drop 6.0" (previous inspection was 18.5", 16.5") ceramics were replaced in 2018

%CV = 0% (previously 43%, not sure if this was a correct reading)

Fan Speed 100%, 2088 RPM, 112 amps, 640 Bus VDC (same as previous inspection)

The following is a list of special conditions for the FG-COATINGLINE, the requirement and how they comply with each condition:

Special Condition	Requirement	Compliance Evaluation
I.1	176.3 tpy VOC	Summary records for December 2022 showed VOC emissions of 86.5 tons, well below the permit limit. See Attachment A.
I.2		

	3.7 tpy dibasic ester family	December 2022 VOC records showed the actual dibasic ester family materials as used had emissions of 0.01 tpy (previously 0.01, 0.031 tpy), well below the permit limit. See Attachment "A" for details.
I.3	13.1 tpy Ethylbenzene	December 2022 VOC records showed the actual emissions of Ethylbenzene to be 0.46 tpy (previously 0.46, 0.54 tpy), well below the permit limit. See Attachment "A" for details.
I.4	1.4 tpy Formaldehyde	December 2022 VOC records showed the actual Formaldehyde emissions to be 0.44 tpy (previously 0.44, 0.53 tpy), well below the permit limit. See Attachment "A" for details.
III.1	Reclaim 70 percent by weight of all purge solvents.	No review of the purge reclaim was conducted during this inspection. Given paint line purging occurs in the spray booth with the control device on and operating, it would be easy to assume the 90% capture and 95% destruction easily achieves better than 70% disposal of purge solvents. Previously a review of the 2013 purge manifest records and the amounts purchased was conducted. The facility reclaimed approximately 52.6% of purge solvent based upon purchase/manifest records. Those purge solvents not collected would have occurred in the controlled paint booths with 90% capture and 95% destruction. Therefore the facility would be in compliance with the 70% reclaim/removal/disposal (in this case destruction) requirements.
III.3	Captured waste coatings must be in closed containers	All coating materials were closed in the paint kitchen area. There was 1 spray booth wall grease container that was pointed out to Evan that needed to maintain a cover on the material.
III.4	Submit a MAP	The facility submitted a revised Malfunction Abatement Plan (MAP) in May 2022 with the installation of the new RTO.
III.5	Submit a plan to minimize emissions from Start up, Shutdown and malfunctions.	This plan was also included as part of the MAP submitted in May 2022.

IV.1	Install and maintain a water wash system.	Copies of CQ Service Reports for the water wash system was requested like previous inspections. Information was provided to show maintenance on the 5 stage parts washer prior to the coating line. This documentation did not demonstrate the waterwash system was installed, maintained and operated in a satisfactory manner. Due to other more important violation discoveries this item will be reassessed at a future site inspection or site visit.
IV.2	Non-electrostatic applicators or better	Booths used 3 robotic applicators. Ventra Fowlerville does not use any HVLP applicators, therefore test caps are not applicable. The facility uses spray equipment with comparable technology and transfer efficiency.
IV.3	1400 Degrees Fahrenheit temperature and monitoring requirement.	The facility uses a wheel chart recorder. Charts were obtained for the weeks of 12/10, 12/17 and 1/2/18. The 1/2/19 chart was overwritten with the previous week, but it appears this was corrected on 1/3. Weekly wheel charts showed the oxidizer to be above 1500 degree's except during the weekends or when there was no production. See Attachment "B"
V.1	Method 24	Company uses vendor formulation data and MSDS to determine VOC contents
V.2	Conduct performance testing every 5 years unless an acceptable demonstration shows the previous results are still valid.	The facility conducted stack testing to prove capture and destruction efficiency on November 6th, 2014 when the adhesion promoter line was connected to the RTO. Testing will be again be verified in the summer of 2019 as discussed in the ROP renewal meeting held on November 8, 2018.
VI.1	Complete all calculations by 15th day of the month	VOC records were up to date.
VI.2		The facility uses a wheel chart recorder. Charts were obtained for the weeks of 12/10,

	Monitor the RTO combustion chamber temperature.	12/17 and 1/2/18. The 1/2/19 chart was overwritten with the previous week, but it appears this was corrected on 1/3. Charts are included as Attachment "B" of this report.
VI.3	Maintain MSDS and/or formulation data.	No review of the MSDS was conducted during this site inspection. However, the facility has always had all MSDS available for review if needed.
VI.4	Maintain VOC records.	Copies of the VOC records ending for the month of December 2018 are included as attachment "A" of this report.
VI.5	Maintain Toxic Air Contaminant (TAC) records.	Copies of the TAC records ending for the month of December 2018 are included as attachment "A" of this report.
VI.6	Monitor and record a parameter to demonstrate capture.	The facility was asked for records of the RTO fan speed which was previously recorded on a daily basis as found in the Robot Technician Start Up Checklist. Kaylyn was not aware of any record regarding the RTO fan speed and the ROP does not currently obligate Ventra Fowlerville to recording it. Operating parameters were observed during the day of the site inspection and it appeared the VFD was not in use and the fan was simply operating at maximum speed consistently.
VII-1 through VII.3	Standard ROP reporting	Yes, annual and semi-annual submittals with deviation reports have been received.
VIII	Stack restrictions	Stack parameters for FG-COATINGLINE were confirmed in the MAERS submittal.
IX.1	Comply with Subpart PPPP	Summary records for December 2018 showed HAP emissions of .01 lbs HAP/l b solids, well below the MACT limit of 0.16 lbs HAP/lb soilds. See Attachment A.

VOC recordkeeping

For VOC emissions from the painting line, Ventra Fowlerville uses their EMTRACK data system for recording and calculating VOC and HAP emission data. A monthly log from the paint kitchen is sent back to the office for data entry into EMTRACK. In the paint kitchen, actual usages, including solvent additions are kept by each shift each day, and then are compared to supplier (Dupont and NB Coatings) invoices to make sure the paint inventory is balanced with usage. The facility can spray over 100 different colors.

Copies of the VOC and HAP summaries for January 2017 were obtained and are included as attachment "A" with this report. The records obtained were reviewed and they are below their respective VOC emission limits as found in the ROP.

Plastic Parts MACT

Initial notification – March 31, 2009 due, received April 29, 2009.

Based upon the initial information obtained during the original site inspection it appeared that control credit was being taken for HAP emissions. This should not be allowed as the company has not conducted proper monitoring, recordkeeping, testing and proper notifications to switch compliance options under MACT Subpart PPPP. Using the basis information obtained it was apparent control credit was erroneously being taken and that if control credit was not take they would have exceeded the 0.16 LB HAP per Lb Solids emission limits in MACT PPPP. Additional follow up information was requested and provided on February 7, 2019. Review of this data still appeared to show errors and a meeting was held with Ventra on March 4, 2019 at Constitution Hall. The discrepancies were pointed out and further additional information was requested for all Ad Pro usages/MSDS for all of 2018 as well as all Basecoat/Topcoat usages and MSDS for February 2018. This information was provided on March 8, 2019 but did not provide summary information as to what the corrected increase in emissions would be. Review of this data again continued to show discrepancies in SDS information. Ad Pro information had transposed numbers in favor of Ventra's emissions. Topcoat emissions also are under reported based upon my review of the detailed data provided for February 2018 putting them well above the MACT PPPP limit for that month. Because this was the second attempt at obtaining information to show compliance and the fact that all sets of data point to an emission limit violation, a violation notice will be sent. This will include violations for FG-MACTSUBJECT:

- exceeding the emission limit of 0.16 LB HAP per Lb Solids. 40 CFR 63.4490(a)(1), Special Condition I.1 of FG-MACTSUBJECT.
- applying control credit without monitoring parameters to verify operating limits or recordkeeping for monitoring operating parameters to use the control compliance option. 40 CFR 63.4492(b) and Table 1, Special Condition III.1 of FG-MACTSUBJECT.
- The facility was using control credit in their existing records which requires a Work Practice Plan be established. 40 CFR 63.4493(b)(1), Special Condition III.2 of FG-MACTSUBJECT.

- The facility was using control credit in their existing records which requires a Start up Shut Down and Malfunction Plan (SSMP) be established. 40 CFR 63.4500(c), Special Condition III.3 of FG-MACTSUBJECT.
- The facility was using control credit in their existing records which requires a proper capture test to establish operating parameters. 40 CFR 63.4560(a)(1), 40 CFR 63.4564(a), Special Condition V.2 of FG-MACTSUBJECT.
- The facility did not provided the proper compliance option for compliance reports, the facility did not properly report deviations and the facility did not provide a notification of change for changing compliance options. 40 CFR 63.7(b), 40 CFR 63.8(f)(4), 63.9(b) through (h), 40 CFR 63.4510, Special Condition VII.7 and VII.8 of FG-MACTSUBJECT.

Boilers/Hot Water Heaters – MACT DDDDD

The facility also has 2 natural gas fired water heaters which are exempt under Rule 282(b)(i). Both units are new and are 1.7 MMBTU/hr or less. All units are used to provide process water to the washer and building heat. The units had their MACT DDDDD tune ups completed on October 1, 2015.

Diesel Generator – MACT ZZZZ

The facility has a Spectrum 300 Detroit Diesel emergency generator that was installed when the facility began operation in March 2006. The rated capacity of the generator is 300 HP. A copy of the PM work order details was obtained which showed a total of 427.6 hours and 0.1 hours for maintenance check. The previous inspections noted 427.2 and 323.5 hours total. A copy of the hours operated and the maintenance record is included as Attachment "D" to this report.

Stacks

Observation of the new RTO raised the question of how tall was the exhaust stack. Evan was asked to provide documentation showing the stack height meet the 75 foot requirement found under the new PTI 247-04C.

2021 MAERS Submittal

A review of the 2021 MAERS submittal was done and no errors or discrepancies were found

Conclusion:

The facility is in compliance with all applicable rules and regulations. The site inspection was un-announced, Evan was very helpful in getting the information needed in a timely fashion.

NAME [signature] DATE 4/27/23 SUPERVISOR [signature]

EGLE REQUEST OF INFORMATION - 2023

Included:

1. **Summary of VOC records of 2022 and a month of detailed VOC records for December 2022**
2. **2022 Monthly emissions records for Dibasic Ester, Ethylbenzene, and Formaldehyde.**
3. **Demonstration of 70% reclaim of all purge solvents**
4. **HAP emissions data summary for all months of 2022**
5. **Details HAP emission records for December 2022**
6. **Provide a copy of the latest Boiler MACT Tune-up**
7. **Records of the hours of operation for EUDIESGEN**
8. **Records of the oil changes, air cleaner, and inspection of hoses for EUDIESGEN.**

PRE-DESTRUCTION

VOC RECORDS FOR 2022

12 Month Summary For Permit ROP-N741

Month	Material Volume	Additive Volume	Total #VOC	Total Gallons
2022-01	14230.69	1607.80	73778.43	15838.49
2022-02	10727.12	1186.80	55811.39	11913.92
2022-03	17907.40	1992.80	92877.14	19900.20
2022-04	13998.40	1570.80	72317.44	15569.20
2022-05	10950.23	1183.30	56418.16	12133.53
2022-06	10983.17	1254.00	57010.74	12237.17
2022-07	11149.12	1223.50	59261.25	12372.62
2022-08	9952.87	980.10	50769.18	10932.97
2022-09	11298.51	1254.50	57727.97	12553.01
2022-10	12406.30	1170.60	66443.06	13576.90
2022-11	11556.09	1299.70	59649.37	12855.79
2022-12	9848.90	1069.90	50274.02	10918.80
Permit Total	145008.87	15793.80	752338.20	160802.67
		Tons	376.16	
Grand Total	145008.87	15793.80	752338.20	160802.67
		Tons	376.16	

POST DESTRUCTION

VOC RECORDS FOR 2022

12 Month Summary For Permit ROP-N741

Month	Material Volume	Additive Volume	Total #VOC	Total Gallons
2022-01	14230.69	1607.80	16969.03	15838.49
2022-02	10727.12	1186.80	12836.62	11913.92
2022-03	17907.40	1992.80	21361.74	19900.20
2022-04	13998.40	1570.80	16633.01	15569.20
2022-05	10950.23	1183.30	12976.17	12133.53
2022-06	10983.17	1254.00	13112.47	12237.17
2022-07	11149.12	1223.50	13630.08	12372.62
2022-08	9952.87	980.10	11676.91	10932.97
2022-09	11298.51	1254.50	13277.43	12553.01
2022-10	12406.30	1170.60	15281.90	13576.90
2022-11	11556.09	1299.70	13719.35	12855.79
2022-12	9848.90	1069.90	11563.02	10918.80
Permit Total	145008.87	15793.80	173037.78	160802.67
		Tons	86.51	
Grand Total	145008.87	15793.80	173037.78	160802.67
		Tons	86.51	

DETAILED VOC RECORDS

DECEMBER 2022

Month 2022-12 Monthly Detail For Permit ROP-N741

Device Id	MATERIAL P-No.	Vol-H2O	#VOC/Gal	ADDITIVE 1 PA-No.	Vol-H2O	#VOC/Gal	ADDITIVE 2 PA-No.	Vol-H2O	#VOC/Gal	TOTAL #VOC	TOTAL GALLONS	AVERAGE #VOC/Gal	Day
ADPRO	LOW HAPS	1761.00	6.40	EA	70.40	7.50		0.00	0.00	11798.82	1831.40	6.44	31
ADPRO		1761.00			70.40			0.00		11798.82	1831.40	6.44	
BASECOAT	AGATE	607.00	4.30	NBA	91.10	7.22	EEP	134.90	7.93	4337.59	833.00	5.20	31
	AZURE GRAY	2.00	3.90	NBA	0.30	7.22		0.00	0.00	9.96	2.30	4.33	31
	BOLDER	2.00	5.40	NBA	0.20	7.22		0.00	0.00	12.24	2.20	5.56	31
	BRILLIANT	36.00	3.91	NBA	7.20	7.22		0.00	0.00	192.96	43.20	4.46	31
	CACTUS	5.00	3.90	NBA	0.80	7.22		0.00	0.00	25.27	5.80	4.35	31
	CARBONIZED	531.00	4.20	NBA	13.30	7.22		0.00	0.00	2326.22	544.30	4.27	31
	CERAMIC	58.00	3.90	NBA	3.90	7.22		0.00	0.00	254.35	61.90	4.10	31
	CERAMIC	12.00	4.00	NBA	0.30	7.22		0.00	0.00	50.16	12.30	4.07	31
	CHROMA	8.00	4.40	NBA	1.20	7.22		0.00	0.00	43.86	9.20	4.76	31
	CLEARCOAT	3369.00	3.40	SC100	224.60	7.32	SC150	74.90	7.40	13653.75	3668.50	3.72	31
	DARK BLUE	13.00	4.09	SC100	2.00	7.32		0.00	0.00	67.87	15.00	4.52	31
	EMBER	14.00	4.50		0.00	0.00		0.00	0.00	63.00	14.00	4.50	31
	POLICE RED	10.00	3.63	SC100	1.50	7.32		0.00	0.00	47.36	11.50	4.11	31
	FLIGHT BLUE	158.00	4.10	NBA	14.00	7.22		0.00	0.00	748.88	172.00	4.35	31
	FORGED	67.00	3.90	NBA	10.40	7.22		0.00	0.00	336.38	77.40	4.34	31
	FOUNDRY	1.00	3.82	NBA	0.20	7.22		0.00	0.00	5.26	1.20	4.38	31
	HOT PEPPER	4.00	3.80	NBA	0.80	7.22		0.00	0.00	20.97	4.80	4.37	31
	HOT PEPPER	4.00	3.30	SC100	0.60	7.32		0.00	0.00	17.59	4.60	3.82	31
	ICONIC	37.00	4.19	NBA	6.50	7.22		0.00	0.00	201.96	43.50	4.64	31
	JEWEL RED	67.00	4.10	NBA	8.40	7.22		0.00	0.00	335.34	75.40	4.44	31
	JEWEL RED	53.00	3.50	SC100	4.70	7.32		0.00	0.00	219.91	57.70	3.81	31
	KHAKI	8.00	4.00	SC100	1.20	7.32		0.00	0.00	40.78	9.20	4.43	31
	LUCID RED	131.00	4.60	NBA	14.60	7.22		0.00	0.00	708.01	145.60	4.86	31
	LUCID RED	130.00	3.80	SC100	5.80	7.32		0.00	0.00	536.46	135.80	3.95	31
	MIDNIGHT	18.00	4.50	SC100	1.10	7.32	NBA	3.60	7.22	115.04	22.70	5.06	31
	OXFORD	463.00	3.87	NBA	23.20	7.22		0.00	0.00	1960.70	486.20	4.03	31
	PRAA	6.00	3.40	NBA	1.10	7.22		0.00	0.00	28.34	7.10	3.99	31
	PASSION RED	28.00	4.50	NBA	3.10	7.22		0.00	0.00	148.38	31.10	4.77	31
	POLICE	38.00	3.80	NBA	4.80	7.22		0.00	0.00	179.05	42.80	4.18	31
	RIVER ROCK	28.00	4.40	NBA	5.60	7.22		0.00	0.00	163.63	33.60	4.87	31
	SHADOW	3.00	4.30	NBA	0.20	7.22		0.00	0.00	14.34	3.20	4.48	31
	SILVER GREY	11.00	3.81	NBA	1.00	7.22		0.00	0.00	49.15	12.00	4.09	31
	SMOKESTON	6.00	3.71	NBA	0.90	7.22		0.00	0.00	28.76	6.90	4.16	31
	STAR WHITE	610.00	4.00	NBA	67.80	7.22		0.00	0.00	2929.51	677.80	4.32	31
	STAR WHITE	170.00	4.00	NBA	17.00	7.22		0.00	0.00	802.74	187.00	4.29	31
	STERLING	40.00	4.04	NBA	6.00	7.22	SC150	2.00	7.40	220.09	48.00	4.58	31
	VAPOR BLUE	6.00	5.00	NBA	0.80	7.22		0.00	0.00	35.77	6.80	5.26	31
	ATOMIC	45.00	3.70	NBA	10.00	7.22		0.00	0.00	238.70	55.00	4.34	31
	BALTIC	50.00	3.81	NBA	5.60	7.22	EEP	5.60	7.93	275.69	61.20	4.50	31
	BILLET	2.00	4.54	SC100	0.20	7.32	EEP	0.20	7.93	12.13	2.40	5.05	31
	BLACK	317.00	3.72	NBA	70.40	7.22		0.00	0.00	1689.43	387.40	4.36	31
	BLACK	4.00	4.60	NBA	0.90	7.22		0.00	0.00	24.92	4.90	5.08	31

Month 2022-12 Monthly Detail For Permit ROP-N741

Device Id	MATERIAL P-No.	MATERIAL Vol-H2O	MATERIAL #VOC/Gal	ADDITIVE 1 PA-No.	ADDITIVE 1 Vol-H2O	ADDITIVE 1 #VOC/Gal	ADDITIVE 2 PA-No.	ADDITIVE 2 Vol-H2O	ADDITIVE 2 #VOC/Gal	TOTAL #VOC	TOTAL GALLONS	AVERAGE #VOC/Gal	Day
BASECOAT	BRIGHT	221.00	3.90	NBA	44.20	7.22		0.00	0.00	1181.02	265.20	4.45	31
	EBONY	132.00	4.23	NBA	13.20	7.22		0.00	0.00	654.85	145.20	4.51	31
	FLAME RED	19.00	3.75	NBA	1.70	7.22	SC100	2.10	7.32	98.90	22.80	4.33	31
	GRANITE	6.00	4.58	NBA	1.30	7.22		0.00	0.00	36.86	7.30	5.05	31
	ICONIC	219.00	4.19	NBA	24.30	7.22	EEP	29.20	7.93	1324.61	272.50	4.86	31
	PATRIOT	2.00	3.90	NBA	0.40	7.22		0.00	0.00	10.68	2.40	4.45	31
	SILVER	123.00	4.70	SC100	27.10	7.32		0.00	0.00	776.52	150.10	5.17	31
	SUPER	7.00	4.96		0.00	0.00		0.00	0.00	34.73	7.00	4.96	31
	WILD GREEN	15.00	4.00	NBA	0.80	7.22		0.00	0.00	65.77	15.80	4.16	31
	CENOTE	6.00	4.20	NBA	0.70	7.22		0.00	0.00	30.25	6.70	4.51	31
BASECOA		7922.00			747.00			252.50		37386.89	8921.50	4.19	
PURGE	CN31867	165.90	6.56		0.00	0.00		0.00	0.00	1088.30	165.90	6.56	31
PURGE		165.90			0.00			0.00		1088.30	165.90	6.56	

2022 MONTHLY EMISSION RECORDS

Dibasic Ester, Ethylbenzene, and Formaldehyde

01/01/2022 - 12/31/2022 Total Component Usage for Permit ROP-N741

CAS Number	Component Name	Total Lbs.	Total Tons
50000	FORMALDEHYDE (U122)	24.31	0.01
64175	DENATURED ALCOHOL	1.31	0.00
67561	METHANOL (U154)	2587.17	1.29
67630	ISOPROPYL ALCOHOL	2978.13	1.48
67641	ACETONE (U002)	10706.78	5.35
71363	N-BUTYL ALCOHOL (U031)	52109.50	26.05
71410	AMYL ALCOHOL	173.57	0.08
71432	BENZENE(INCLUDING BENZENE FROM GASOLINE)	0.09	0.00
78831	2-METHYL-1-PROPANOL	8467.48	4.23
78933	METHYL ETHYL KETONE 2-BUTANONE (U159)	5168.41	2.58
79094	PROPIONICACID	0.09	0.00
91203	NAPHTHALENE	4465.62	2.23
95636	1,2,4 TRIMETHYLBENZENE	80459.66	40.22
98828	CUMENE (U055)	5320.34	2.66
100414	ETHYLBENZENE	11913.93	5.95
103093	2-ETHYLHEXYL ACETATE	5.39	0.00
103651	PROPYLBENZENE	5662.67	2.83
106365	Propyl Propionate	21150.21	10.57
107664	64741657	0.17	0.00
107982	1-METHOXY-2-PROPANOL	4.47	0.00
108327	Propylene Carbonate	198.25	0.09
108656	PM ACETATE	12399.98	6.19
108678	1,3,5 TRIMETHYLBENZENE	16568.04	8.28
108827	108872	0.05	0.00
108838	DIISOBUTYL KETONE	543.12	0.27
108872	METHYLCYCLOHEXANE	4.04	0.00
108883	METHYLBENZENE/TOLUENE (U220)	7244.62	3.62
108952	PHENOL	2.92	0.00
109831	2-METHYLAMINOETHANOL	8.13	0.00
109999	TETRAHYDROFURAN (U213)	257.97	0.12
110190	ISOBUTYL ACETATE	14878.55	7.43
110430	METHYL AMYL KETONE	1240.91	0.62
110827	CYCLOHEXANE	6735.04	3.36
111762	ETHYLENE GLYCOL M-BUTYL ETHER/BUTYL	420.93	0.21
112072	ETHYLENE GLYCOL MOMOBUTYL ETHER ACETATE	8.54	0.00
123864	BUTYL ACETATE	151140.93	75.57
124685	2amino2methyl1propanol	58.44	0.02
137326	2-Mthyl-1-Butanol	43.77	0.02
141786	ETHYL ACETATE (U112)	23834.25	11.91
142825	HEPTANE	8710.32	4.35
526738	1,2,3-Trimethyl Benzene	3.50	0.00
590012	Propionic Acid, N-Butyl Ester	6951.52	3.47
624419	2METHYLBUTYLACETATE	878.13	0.43
628637	PRIMARY AMYL ACETATE	3019.98	1.50

01/01/2022 - 12/31/2022 Total Component Usage for Permit ROP-N741

CAS Number	Component Name	Total Lbs.	Total Tons
763699	ETHYL-3-ETHYLOXYPROPIONATE	17721.53	8.86
822060	HEXAMETHYLENE-1,6-DIISOCYANATE	3.21	0.00
1119400	DIMETHYL GLUTARATE	318.45	0.15
1317802	Titanium Dioxide (Rutile)	0.71	0.00
1330207	XYLENE MIXED ORTHO, META, AND PARA ISOMERS	50935.90	25.46
1333864	BLACK PIGMENT CARBON	1040.73	0.52
1445450	TRIMETHYL-O-ACETATE	647.17	0.32
1623150	67561	0.34	0.00
1954980	4,6 - Dimethyl - 2- Heptanone	0.27	0.00
2534170	Diethylbenzene	1.43	0.00
7429905	ALUMINUM (FUME OR DUST)	8.82	0.00
7631869	SILICA	1157.22	0.57
7732185	WATER	31.61	0.01
8032324	MINERAL SPIRITS	21.65	0.01
8052413	MEDIUM ALIPHATIC SOLVENT NAPHTHA	98.35	0.04
13463677	TITANIUM DIOXIDE	20044.50	10.02
14059337	bixmuthvanadium oxide	1.90	0.00
19549805	4,6Dimethyl2Heptanone	120.37	0.06
21645512	aluminum hydrate	942.21	0.47
25340174	Diethylbenzene	226.23	0.11
25551137	TRIMETHYLBENZENE	263.00	0.13
27646806	2methylamino2methylpropanol	1.26	0.00
28182812	HOMOPOLYMER OF HDI	1703.07	0.85
590-01-2	Propionic Acid, N-Butyl Ester	639.96	0.31
64741657	Heavy Mineral Spirits	23.79	0.01
64742478	HYDROTREATED LIGHT DISTILLATE	13.95	0.00
64742489	HYDROTREATED HEAVY NAPTHA	10179.75	5.08
64742490	HYDROTREATED IGHT NAPTHA	6.71	0.00
64742810	Desulfurized distillate	6.43	0.00
64742821	Naphtha, Hydrodesulfurized	2.87	0.00
64742887	NAPHTHA, MEDIUM	300.43	0.15
64742898	ALIPHATIC PETROLEUM DISTILLATE VM+P NAPHTHA	2072.28	1.03
64742945	AROMATIC PETROLEUM DISTILLATES HEAVY NAPHTHA	34864.71	17.43
64742956	AROMATIC PETROLEUM DISTILLATES	155331.93	77.66
68440664	95476	63.05	0.03
68955248	Melamine Resin	9210.46	4.60
70657704	2Methoxy1Propanol Acetate	1.37	0.00
	Total	774359.20	387.17
	Grand Total	774359.20	387.17

HAP EMISSIONS DATA SUMMARY

All months of 2022

Flex|N|Gate Group
Ventra Fowlerville, LLC
General Manager
8887 W Grand River Ave.
Fowlerville, MI
48836
P: +1.616.755.5308
GStocks@flexngate.com

INTERIOR & EXTERIOR PLASTICS
BODY STRUCTURE & EXTERIOR METALS
MECHANICAL ASSEMBLIES
DESIGN & PROTOTYPING
LIGHTING SYSTEMS
SEQUENCING

13 January 2023

Michigan Department of Environmental, Great Lakes, and Energy
Air Quality Division
525 W. Allegan St.
Lansing, MI 48909

Attention: Mr. Robert Byrnes, Senior Environmental Engineer

Re: Ventra Fowlerville, LLC
Consent Order AQD No. 2019-22
SRN: N7413, Livingston County

Dear Mr. Robert Byrnes,

Please find attached the quarterly actual HAP emission rate records for FG-MACTSUBJECT as required by Consent Order AQD No. 2019-22.

Should you have any questions or concerns regarding this information, please feel free to contact Evan Urbanski, EHS Manager, at (517) 304-8306.

Yours very truly,
VENTRA FOWLERVILLE, LLC.

By: _____
George Stocks
General Manager

Attach:

A - 12 Month Rolling HAP Emission Records
B – October 2022 HAP Emission Records
C – November 2022 HAP Emission Records
D – December 2022 HAP Emission Records

Applied Solids - 12 Month Summary For Emission Unit EUCOATING LINE

Month	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
)22-01	13105.49	2166.06	5648.57	56287.23	53517.16	0.10	1.05	25.98	2.60
)22-02	9703.92	1491.67	4371.43	41667.39	39874.64	0.10	1.04	27.93	2.93
)22-03	16404.20	2767.66	6857.04	70502.74	66870.39	0.10	1.05	25.47	2.47
)22-04	12969.20	2050.42	5483.85	55677.44	53772.31	0.10	1.03	27.15	2.67
)22-05	10001.53	1573.69	4312.89	42773.36	41434.44	0.10	1.03	27.18	2.74
)22-06	10130.17	1801.07	4148.95	43525.94	40665.16	0.10	1.07	24.16	2.30
)22-07	10079.62	1367.24	3457.11	44586.05	41649.17	0.08	1.07	32.61	2.52
)22-08	9012.07	1692.97	3847.34	38393.69	38454.68	0.10	0.99	22.67	2.27
)22-09	10539.61	1737.44	4429.00	44756.60	43959.50	0.10	1.01	25.75	2.54
)22-10	11574.90	1860.15	5757.04	53545.10	41290.96	0.13	1.29	28.78	3.09
)22-11	10731.09	1743.31	4207.40	45960.93	44977.22	0.09	1.02	26.36	2.41
)22-12	9087.40	1649.46	3533.27	38475.20	38062.47	0.09	1.01	23.32	2.14
Emission Unit	*****.**	21901.19	56053.96	576151.72	544528.17	0.10	1.05	26.30	2.55
		Tons	28.02	288.07	272.26				
:and Total	160802.67	24961.57	82803.14	752338.20	574644.08	0.14	1.30	30.13	3.31
		Tons	41.40	376.16	287.32				

pre - destruction

Applied Solids - 12 Month Summary For Emission Unit EUCOATING LINE

Month	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
2022-01	13105.49	2166.06	1299.17	12946.06	53517.16	0.02	0.24	5.97	0.59
2022-02	9703.92	1491.67	1005.43	9583.50	39874.64	0.02	0.24	6.42	0.67
2022-03	16404.20	2767.66	1577.11	16215.63	66870.39	0.02	0.24	5.85	0.56
2022-04	12969.20	2050.42	1261.28	12805.81	53772.31	0.02	0.23	6.24	0.61
2022-05	10001.53	1573.69	991.96	9837.87	41434.44	0.02	0.23	6.25	0.63
2022-06	10130.17	1801.07	954.26	10010.96	40665.16	0.02	0.24	5.55	0.52
2022-07	10079.62	1367.24	795.13	10254.79	41649.17	0.01	0.24	7.50	0.58
2022-08	9012.07	1692.97	884.88	8830.54	38454.68	0.02	0.22	5.21	0.52
2022-09	10539.61	1737.44	1018.67	10294.01	43959.50	0.02	0.23	5.92	0.58
2022-10	11574.90	1860.15	1324.12	12315.37	41290.96	0.03	0.29	6.62	0.71
2022-11	10731.09	1743.31	967.70	10571.01	44977.22	0.02	0.23	6.06	0.55
2022-12	9087.40	1649.46	812.65	8849.29	38062.47	0.02	0.23	5.36	0.49
Emission Unit	*****.**	21901.19	12892.41	132514.89	544528.17	0.02	0.24	6.05	0.58
		Tons	6.44	66.25	272.26				
Grand Total	160802.67	24961.57	19044.72	173037.78	574644.08	0.03	0.30	6.93	0.76
		Tons	9.52	86.51	287.32				

post destruction

Applied Solids - 12 Month Summary For Emission Unit EUAPPROCESS

Month	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
022-01	2733.00	308.82	2699.31	17491.20	3039.05	0.88	5.75	56.63	8.74
022-02	2210.00	249.73	2182.75	14144.00	2457.48	0.88	5.75	56.63	8.74
022-03	3496.00	395.04	3452.90	22374.40	3887.50	0.88	5.75	56.63	8.74
022-04	2600.00	293.80	2567.95	16640.00	2891.16	0.88	5.75	56.63	8.74
022-05	2132.00	240.91	2105.72	13644.80	2370.75	0.88	5.75	56.63	8.74
022-06	2107.00	238.09	2081.02	13484.80	2342.95	0.88	5.75	56.63	8.74
022-07	2293.00	259.10	2264.73	14675.20	2549.78	0.88	5.75	56.63	8.74
022-08	1920.90	208.71	1824.23	12375.49	2053.83	0.88	6.02	59.29	8.74
022-09	2013.40	218.76	1912.13	12971.36	2152.80	0.88	6.02	59.29	8.74
022-10	2002.00	217.52	1901.27	12897.96	2140.57	0.88	6.02	59.29	8.74
022-11	2124.70	230.85	2017.81	13688.44	2271.78	0.88	6.02	59.29	8.74
022-12	1831.40	198.99	1739.29	11798.82	1958.20	0.88	6.02	59.29	8.74
Emission Unit	27463.40	3060.37	26749.17	176186.48	30115.91	0.88	5.85	57.57	8.74
		Tons	13.37	88.09	15.05				

pre-destruction

Applied Solids - 12 Month Summary For Emission Unit EUAPPROCESS

Month	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
:022-01	2733.00	308.82	620.84	4022.97	3039.05	0.20	1.32	13.02	2.01
:022-02	2210.00	249.73	502.03	3253.12	2457.48	0.20	1.32	13.02	2.01
:022-03	3496.00	395.04	794.16	5146.11	3887.50	0.20	1.32	13.02	2.01
:022-04	2600.00	293.80	590.62	3827.20	2891.16	0.20	1.32	13.02	2.01
:022-05	2132.00	240.91	484.31	3138.30	2370.75	0.20	1.32	13.02	2.01
:022-06	2107.00	238.09	478.63	3101.50	2342.95	0.20	1.32	13.02	2.01
:022-07	2293.00	259.10	520.88	3375.29	2549.78	0.20	1.32	13.02	2.01
:022-08	1920.90	208.71	419.57	2846.36	2053.83	0.20	1.38	13.63	2.01
:022-09	2013.40	218.76	439.79	2983.41	2152.80	0.20	1.38	13.63	2.01
:022-10	2002.00	217.52	437.29	2966.53	2140.57	0.20	1.38	13.63	2.01
:022-11	2124.70	230.85	464.09	3148.34	2271.78	0.20	1.38	13.63	2.01
:022-12	1831.40	198.99	400.03	2713.72	1958.20	0.20	1.38	13.63	2.01
Emission Unit	27463.40	3060.37	6152.31	40522.89	30115.91	0.20	1.34	13.24	2.01
		Tons	3.07	20.26	15.05				

post destruction

Applied Solids - 12 Month Summary For Emission Unit EUCOATING LINE

Month	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
)22-10	11574.90	1860.15	5757.04	53545.10	41290.96	0.13	1.29	28.78	3.09
)22-11	10731.09	1743.31	4207.40	45960.93	44977.22	0.09	1.02	26.36	2.41
)22-12	9087.40	1649.46	3533.27	38475.20	38062.47	0.09	1.01	23.32	2.14
Emission Unit	31393.39	5252.92	13497.73	137981.23	124330.67	0.10	1.10	26.26	2.56
		Tons	6.74	68.99	62.16				
:and Total	37351.49	5900.30	19156.11	176366.46	130701.24	0.14	1.34	29.89	3.24
		Tons	9.57	88.18	65.35				

pre - destruction

Applied Solids - 12 Month Summary For Emission Unit EUAPPROCESS

Month	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
:022-10	2002.00	217.52	1901.27	12897.96	2140.57	0.88	6.02	59.29	8.74
:022-11	2124.70	230.85	2017.81	13688.44	2271.78	0.88	6.02	59.29	8.74
:022-12	1831.40	198.99	1739.29	11798.82	1958.20	0.88	6.02	59.29	8.74
Emission Unit	5958.10	647.37	5658.38	38385.22	6370.56	0.88	6.02	59.29	8.74
		Tons	2.82	19.19	3.18				

pre - destruction

Applied Solids - 12 Month Summary For Emission Unit EUCOATING LINE

Month	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
022-10	11574.90	1860.15	1324.12	12315.37	41290.96	0.03	0.29	6.62	0.71
022-11	10731.09	1743.31	967.70	10571.01	44977.22	0.02	0.23	6.06	0.55
022-12	9087.40	1649.46	812.65	8849.29	38062.47	0.02	0.23	5.36	0.49
Emission Unit	31393.39	5252.92	3104.47	31735.68	124330.67	0.02	0.25	6.04	0.59
		Tons	1.55	15.86	62.16				
rand Total	37351.49	5900.30	4405.90	40564.28	130701.24	0.03	0.31	6.87	0.74
		Tons	2.20	20.28	65.35				

post - destruction

Applied Solids - 12 Month Summary For Emission Unit EUAPPROCESS

Month	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
2022-10	2002.00	217.52	437.29	2966.53	2140.57	0.20	1.38	13.63	2.01
2022-11	2124.70	230.85	464.09	3148.34	2271.78	0.20	1.38	13.63	2.01
2022-12	1831.40	198.99	400.03	2713.72	1958.20	0.20	1.38	13.63	2.01
Emission Unit	5958.10	647.37	1301.42	8828.60	6370.56	0.20	1.38	13.63	2.01
		Tons	0.65	4.41	3.18				

post - destruction

HAP EMISSIONS DATA SUMMARY

Detailed records for December 2022

Month 2022-12 Applied Solids - Monthly Summary For Permit ROP-N741

Device Id	Total Gallons	Gallons Solids	#HAPs	#VOCs	#Solids	#HAPs/ #Solids	#VOCs/ #Solids	#VOCs/ Gal Solids	#HAPs/ Gal Solids
ADPRO	1831.40	198.99	400.03	2713.72	1958.20	0.20	1.38	13.63	2.01
BASECOAT	8921.50	1649.46	810.15	8598.98	38062.47	0.02	0.22	5.21	0.49
PURGE	165.90	0.00	2.49	250.30	0.00				
Month 2022-12	10918.80	1848.45	1212.69	11563.02	40020.68	0.03	0.28	6.25	0.65
		Tons	0.60	5.78	20.01				
Permit Total	10918.80	1848.45	1212.69	11563.02	40020.68	0.03	0.28	6.25	0.65
		Tons	0.60	5.78	20.01				

Boiler/EUDIESGEN records

1. Boiler MACT tune-up
   a. Annual (Goyette)

2. Hours of operation (EUDIESGEN)
   a. PM from December 2022

3. Records of oil changes, air cleaner, and inspection of hoses (EUDIESGEN)
   a. PM from December 2022

GOYETTE MECHANICAL CO., INC.
SERVICE DIVISION
3842 GOREY AVE., FLINT, MI 48506
PH (810) 742-8530 FAX (810) 742-3661

ANNUAL BOILER PEAK PERFORMANCE INSPECTION INCLUDING CSD-1 REQUIREMENTS

CONTRACTOR
LICENSE #3106270 4B
LICENSE #7118536

CUSTOMER Ventra Fowlerville DATE 11/21/2022

ADDRESS 8887 west grand river ave. CITY Fowlerville ZIP 48836

BOILER MAKE Raypak BOILER MODEL# H9-2069B BOILER SERIAL # 1404377514

BURNER MAKE/MODEL# Raypak STATE ID# N/A NATIONAL BOARD # 377514

STEAM ____ HOT WATER X DESIGN PRESSURE Max 160psi OPERATING PRESSURE 12psi

BTU INPUT 2,070,000

	MFG & MODEL #	SET POINT	TRIP/TEST POINT
OPERATING LIMIT	Honeywell T775SP2003	160	160
HIGH LIMIT	Honeywell L4006E	210	210
MOD CONTROL	N/A	N/A	N/A
HI GAS PRESSURE SW	C6097B	7"	
LO GAS PRESSURE SW	C6097A	2"	
RELIEF VALVE	WATTS M	60psi	Lever
AIR FLOW SWITCH	(3) Honeywell IS20360-5687	1.1"	
LOW WATER CUTOFF	N/A		
FLOW SWITCH	Raypak IFS01BN-S2		
FLAME SAFEGAURD	007374F	MAIN	
GAS VALVES	(2) Honeywell VR8345M4823 (3) Robertshaw 7000DERHHC	PILOT	
		BUBBLE TEST	

	PILOT	LO FIRE	HI FIRE
FLAME SIGNAL			

BOILER DESIGN REQUIREMENTS / ACTUAL

	DESIGN		ACTUAL
SUPPLY VOLTAGES	120V		121V
INLET GAS PRESSURE	10.5 max	STATIC	7.5"
		DYNAMIC	
MANIFOLD GAS PRESURE	Min 7"	HIGH	3.5"
		LOW	
PILOT GAS			

MISCELLANEOUS ITEMS

STACK CONDITION	Ok
LINKAGE	N/A
EXPANSION TANK	Tank ok, needs new airvent
REDUCING VALVE	Ok
SIGHT GLASS	N/A
PUMPS	Ok
ELECTRICAL CONNECTIONS	Ok
BOILER ROOM CONDITION	Ok
COMBUSTION AIR	Ok
BOILER CHEMICALS	N/A
COMBUSTION BLOWER AMP DRAW	2.2, 2, 1.8
BOILER RESET CONTROL	Ok
PIPING	Ok
BOILER FLAME	Ok
REFRACTORY	Ok
GAS TRAIN/LEAKS	None
GAUGES/ALARMS	Ok

COMBUSTION EFFICIENCY

	LOW	MID	HI
CO2			8.13%
CO			104ppm
STACK TEMP			287.2
O2			6.40%
EFFICIENCY			85.40%
DRAFT			

NOTES:
HSI= 86.4 ohms, 93.9 ohms

VENTRA FLEX|N|GATE

Simple Work Order Details

520081: DETROIT DIESEL GENERATOR MONTHLY PM

Asset:	FV-DETGEN	SPECTRUM 300 DETRIOT DIESEL GENERATOR
Location:	FVFACILITIES	Fowlerville Facilities (Building and Grounds)
Row / Col:		
Work Type:	PM	
Equipment:		

Status:	INPRG	**Lead:**	VPF23541
Priority:	2	**Crew:**	
Report Date:	12/5/22	**Target Start:**	12/10/22
Reported By:	Cindy Palmer	**Dept/Trade:**	FVMAINT
Classification:			
PM Number:	1458		
Job Plan:	FV-GEN-M		

Task ID	Description	Status
	3/31/2020	INPRG
1	Inspect general condition of the generator.	INPRG
2	Check oil level. (Fill if needed)	INPRG
3	Check fuel level. (Notify supervisor if low)	INPRG
4	Inspect battery charger to insure that it is operational.	INPRG
5	Start generator, allow to operate fifteen minues, and check for unusual noises and leaks.	INPRG
6	Inspect levelers for serviceability loose or missing hardware.	INPRG
7	Insure that exhaust louvers are working properly.	INPRG
10	Record actual run hours. 948	INPRG
15	Record engine temperature. 100	INPRG

Completed By: Dan

Date: 12-7-22

Supervisor: ES

Date: 12/12/22

Certificate of Boiler inspection (expires 2/24/2022) & inspection sticker(s)

P277607

MICHIGAN DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
BUREAU OF CONSTRUCTION CODES BOILER DIVISION
P.O. BOX 30254, LANSING, MICHIGAN 48909
517-241-9334

CERTIFICATE OF BOILER INSPECTION

THE HEREIN DESCRIBED BOILER IS APPROVED FOR OPERATION AT A PRESSURE NOT TO EXCEED THE MAXIMUM OPERATING PRESSURE SPECIFIED HEREON, PROVIDED THE OWNER/USER HAS COMPLIED WITH ALL REQUIREMENTS OF 2016 PA 407, AS AMENDED AND THE RULES AND REGULATIONS PROMULGATED BY THE DIRECTOR OF THE DEPARTMENT. INSTALLATION, REINSTALLATION, ALTERATION, OR REPAIR OF THIS BOILER MUST BE IN STRICT CONFORMITY WITH THE REQUIREMENTS OF 1965 PA 290 AND THE BOILER RULES AND REGULATIONS. THE HOLDER OF THIS CERTIFICATE SHALL NOTIFY THE CHIEF INSPECTOR OF EVERY ACCIDENT INVOLVING PERSONAL INJURY OR DAMAGE TO THIS BOILER.

OWNER/USER
Flex-N-Gate Automotive Corporation
Tony Visnaw
Facilities Manager
8887 W Grand River Rd
Fowlerville, MI 48836-9208

LOCATION
Flex-N-Gate Automotive Corporation "Ventra"
8887 W Grand River Rd
Fowlerville, MI 48836-9208

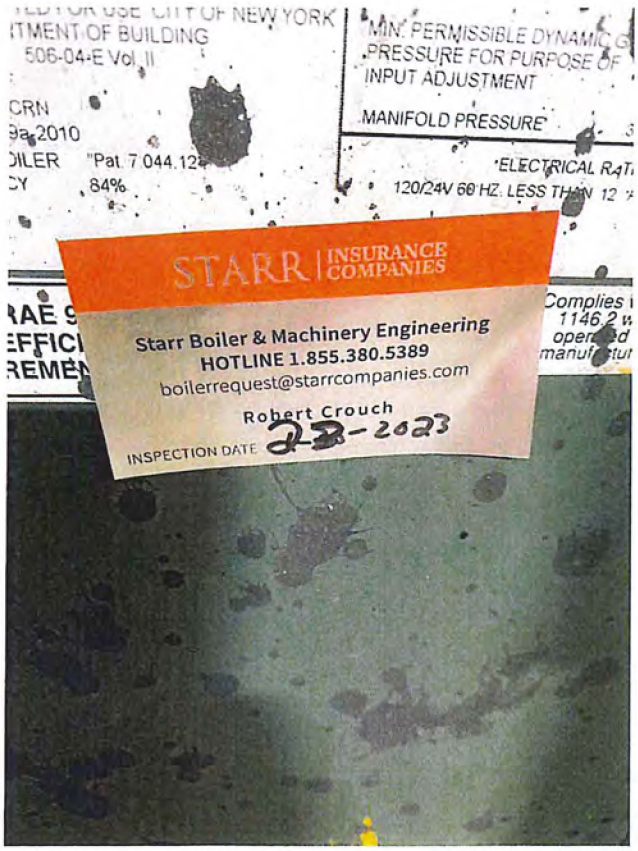
MANUFACTURER: Raypak
BOILER TYPE: Water Tube
YEAR BUILT: 2016
MAX OPR PRESS: 125
SV PRESS: 60
INSPECTOR: Grant Lynch

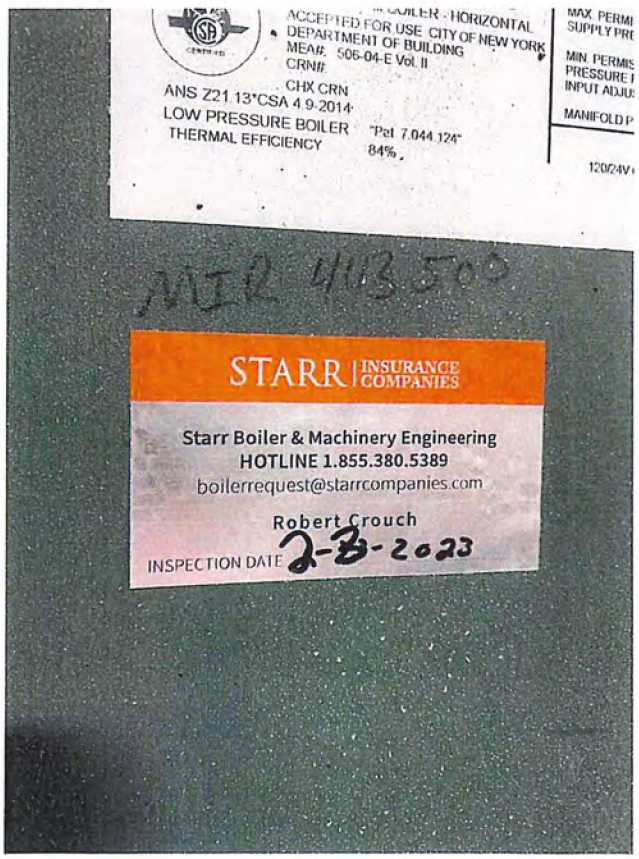
STATE NO: MIR443500
NB# / MFG#: 416688
DATE INSP: 02/24/2020
EXP DATE: 02/24/2023

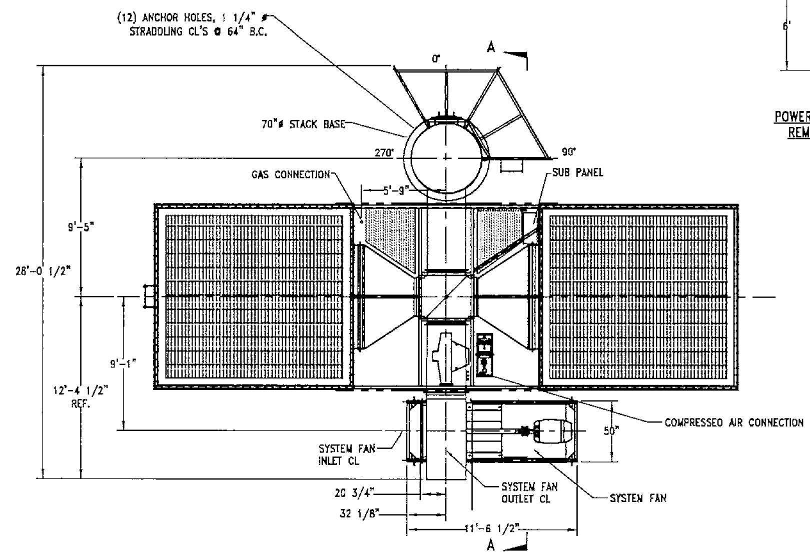
ORLENE HAWKS
DIRECTOR

PLACE IN BOILER ROOM

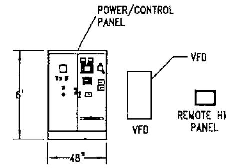
David Stenrose
Chief, Boiler Division



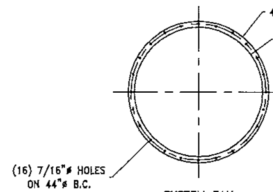




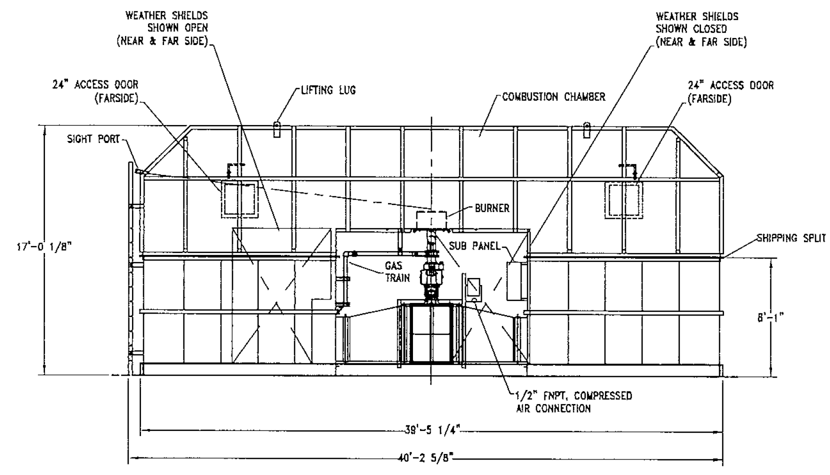
PLAN VIEW
SHOWN W/OUT COMBUSTION CHAMBER



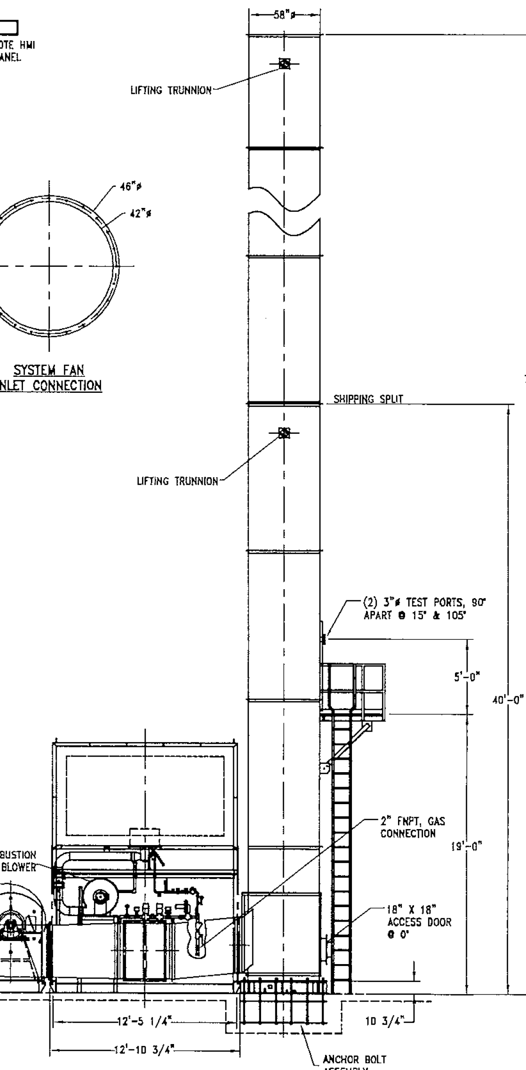
POWER/CONTROL PANEL,
REMOTE HMI & VFD



SYSTEM FAN
INLET CONNECTION



ELEVATION
SHOWN W/OUT FAN



VIEW A-A

SPECIFICATIONS

SYSTEM FAN
IAP MODEL BSW-402-100, ARR. 8, W/200 HP, TEFC MOTOR, VFD CONTROLLED

COMBUSTION CHAMBER
3/16" (A-36) WELDED; 6" THK. 8# CERAMIC FIBER LINING

RECOVERY CHAMBERS
3/16" (A-36) WELDED; 6" THK. 8# CERAMIC FIBER LINING

STACK
3/16" THK. (A-36) WELDED; W/ ANGLE RING STIFFENERS & (2) 3" TEST PORTS. ANCHOR BOLT ASSEMBLY INCLUDED AND TO BE SET IN CONCRETE

TRANSITIONS (INLET & OUTLET)
A-36 CONSTRUCTION, TRANSITIONS TO CHAMBERS W/FLANGED TOP COVER FOR SWITCH VALVE SERVICE.

CERAMIC MEDIA
MULTI-LAYER MEDIA: LANTEC MLM
CERAMIC SADDLES: LANTEC 1 1/2"

SKID SECTION
C10 X 15.3# (A-36) PRE-ASSEMBLED & WIRED

GAS TRAIN
2" FM APPROVED; HONEYWELL V5055 GAS SSOV'S & NORTH AMERICAN VARIABLE RATIO REGULATOR, W/ TURNDOWN

BURNER
NORTH AMERICAN 4841-8AF; 4,400,000 BTU/H MAX.

SWITCH VALVE
STAINLESS STEEL CONSTRUCTION, DOUBLE ACTING PNEUMATIC ACTUATOR W/POSITION SWITCH AND VISUAL INDICATOR

COMBUSTION BLOWER
NORTH AMERICAN 2320-28/2-T7.5, 7.5HP TEFC

POWER PANEL/CONTROL PANEL (REMOTE)
NEMA 12 FREESTANDING W/BLOWER STARTER, CONTROL TRANSFORMER, DATA LOGGER (1-YR STORAGE CAPACITY), HI-LIMIT CONTROLLER, BURNER RELAY, PLC, 15" HMI & MAIN DISCONNECT, 480V/60HZ/3PH

REMOTE HMI
NEMA 12 ENCLOSURE, 15" HMI, 120VAC

SUB PANEL
NEMA 4 W/IGNITION TRANSFORMER, & TERMINAL STRIP 120V AC

VFD
NEMA 1 TO BE MOUNTED BESIDE POWER/CONTROL PANEL

NOTES

1. CERAMIC MEDIA TO BE INSTALLED IN FIELD BY CONTRACTOR.
2. ALL GAS AND COMBUSTION PIPING INSTALLED PRIOR TO SHIPPING. UNIONS INSTALLED FOR FINAL CONNECTION AT ASSEMBLY
3. T.E.I. TO PROVIDE ALL HARDWARE & GASKETS FOR FIELD INSTALLATION
4. OXIDIZER TO BE PAINTED PER TEI STANDARD. (COLOR: GRAY, LADDER & PLATFORM: SAFETY YELLOW)

WEIGHTS

1. SKID ASSEMBLY = 80,000 LBS
2. CERAMIC MEDIA = 84,000 LBS
3. COMBUSTION CHAMBER = 35,000 LBS
4. FAN SKID = 5,500 LBS
5. STACK, PLATFORM, & LADDER = 9,500 LBS

TOTAL = 214,000 LBS

NO.	DATE	BY	REVISION
5			
4			
3			
2			
1			

Turner EnviroLogic©

VENTRA – FOWLERVILLE, MI
REGENERATIVE THERMAL OXIDIZER(40S)
GENERAL ARRANGEMENT

DRAWN BY: TAG	SCALE: 1/4" = 1'	REF. DRAWING: RG4001-A
CHECKED: TKT	DATE: 10-1-21	DRAWING NO.: 8975
APPROVED: TAG	PROJECT: 4070	REV: 0

Byrnes, Bob (EGLE)

From: Evan Urbanski <eurbanski@flexngate.com>
Sent: Friday, February 24, 2023 2:40 PM
To: Byrnes, Bob (EGLE)
Subject: Request for information - Ventra Fowlerville
Attachments: EGLE request of information - 2023.pdf; RTO Temperature data - 1_3_2023 - 1_7_2023.pdf; 8975-0 VENTRA FOWLERVILLE RTO 40S - GA - Schematics.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Byrnes,

Good evening!

I have compiled information based on you remaining questions from our site inspection last week. If you need any additional information please let me know! Please see below:

1. **Summary of VOC records of 2022 and a month of detailed VOC records for December 2022**
   a. See attached (EGLE request of information – 2023)

2. **2022 Monthly emissions records for Dibasic Ester, Ethylbenzene, and Formaldehyde.**
   a. See attached (EGLE request of information – 2023)

3. **RTO Temperature data for 1st week of December 2022**
   a. Informed by program engineer that he did not have that data but was able to provide the information for the first week of January 2023 (attached separately)
   b. See attached (RTO Temperature data – 2-24-23)

4. **Demonstration of 70% reclaim of all purge solvents**
   a. See attached (EGLE request of information – 2023)

5. **A record that demonstrates capture during operation of FGCOATINGLINE, duct static pressure, gas flow rate, or other methods acceptable to the AQD.**
   a. Having an issue with this request. Currently have RWD Technical services balancing our paint booths over the weekend. The lead contractor (Wayne Douglas) for RWD is going to compile some information on the best way to approach this requirement.
   b. He is comparing other customers, who have similar sized RTO's as Ventra Fowlerville, for the best possible way to satisfy this requirement based on the specs for their RTO's. I am hoping to have a plan for demonstrating capture efficiency by next week. We originally were going to monitor static duct pressure but have been unable to get a list of specifications for our current unit to compare it to.

6. **HAP emissions data summary for all months of 2022**
   a. See attached (EGLE request of information – 2023)

7. **Details HAP emission records for December 2022**

a. See attached (EGLE request of information – 2023)

8. **Is Ventra reporting HAP through the CEDRI system?**
   a. No, we are not.

9. **Provide a copy of the latest Boiler MACT Tune-up**
   a. Our annual inspection was performed by Goyette Mechanical Co. on 11/21/2022
   b. Boiler certification expired on 2/24/2023.
      i. Reached out to "boilerrequest@starrcompanies" for an updated inspection report. Current certificate of boiler inspection expired today (2/24/23)

   c. See attached (EGLE request of information – 2023) for both

10. **Records of the hours of operation for EUDIESGEN**
    a. The life of the unit has 448 total hours.
    b. From 10/2022-12-2022 there was a total of one hour of operation for emergency testing. These records are found on PM's for the generator.

    c. See attached (EGLE request of information – 2023)

11. **Records of the oil changes, air cleaner, and inspection of hoses for EUDIESGEN.**
    a. See attached (EGLE request of information – 2023)

12. **Schematic for RTO**
    a. Height of stack
       i. See attached (8975-0 VENTRA FOWLERVILLE RTO 40S - GA – Schematics)

Evan Urbanski
EHS Manager
Ventra Fowlerville, LLC
A Division of Flex-N-Gate Corporation
8887 W. Grand River
Fowlerville, MI 48836
Office (517) 223-5900 Ext. 54504
Mobile (517) 304-8306
Fax (517) 223-8405
eurbanski@flexngate.com

PURGE SOLVENTS

DEMONSTRATION OF RECLAIM

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Jan	
2-Jan	
3-Jan	135
4-Jan	151
5-Jan	113
6-Jan	87
7-Jan	110
8-Jan	
9-Jan	
10-Jan	47
11-Jan	115
12-Jan	106
13-Jan	100
14-Jan	102
15-Jan	
16-Jan	
17-Jan	
18-Jan	97
19-Jan	99
20-Jan	116
21-Jan	112
22-Jan	97
23-Jan	
24-Jan	84
25-Jan	104
26-Jan	109
27-Jan	100
28-Jan	93
29-Jan	
30-Jan	
31-Jan	101
	2178

CN 31867

Total Purge Solvent Used	
6033.1	gallons

Total Purge Solvent Recovered (Assumed to be at least 95%)

5731.4	gallons

Net Usage (Used - Recovered)

301.7

2.77 gal x number of color changes = Amt Purge Used

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Feb	125
2-Feb	85
3-Feb	58
4-Feb	70
5-Feb	
6-Feb	
7-Feb	49
8-Feb	9
9-Feb	48
10-Feb	52
11-Feb	36
12-Feb	
13-Feb	
14-Feb	95
15-Feb	78
16-Feb	71
17-Feb	99
18-Feb	27
19-Feb	
20-Feb	
21-Feb	107
22-Feb	128
23-Feb	110
24-Feb	101
25-Feb	106
26-Feb	
27-Feb	
28-Feb	104
	1558

CN 31867

Total Purge Solvent Used

4315.7 gallons

Total Purge Solvent Recovered (Assumed to be at least 95%)

4099.9 gallons

Net Usage (Used - Recovered)

215.8

2.77 gal x number of color changes = Amt Purge Used

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Mar	90
2-Mar	127
3-Mar	84
4-Mar	106
5-Mar	57
6-Mar	
7-Mar	89
8-Mar	98
9-Mar	75
10-Mar	102
11-Mar	110
12-Mar	79
13-Mar	
14-Mar	99
15-Mar	118
16-Mar	105
17-Mar	92
18-Mar	94
19-Mar	
20-Mar	
21-Mar	85
22-Mar	89
23-Mar	111
24-Mar	96
25-Mar	95
26-Mar	86
27-Mar	
28-Mar	92
29-Mar	113
30-Mar	89
31-Mar	95
	2476

CN 31867

Total Purge Solvent Used

6858.5 gallons

Total Purge Solvent Recovered (Assumed to be at least 95%)

6515.6 gallons

Net Usage (Used - Recovered)

342.9

2.77 gal x number of color changes = Amt Purge Used

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Apr	70
2-Apr	
3-Apr	
4-Apr	93
5-Apr	95
6-Apr	95
7-Apr	117
8-Apr	111
9-Apr	
10-Apr	
11-Apr	73
12-Apr	106
13-Apr	105
14-Apr	67
15-Apr	
16-Apr	
17-Apr	
18-Apr	71
19-Apr	103
20-Apr	93
21-Apr	89
22-Apr	89
23-Apr	
24-Apr	
25-Apr	81
26-Apr	81
27-Apr	82
28-Apr	77
29-Apr	42
30-Apr	
	1740

CN 31867

Total Purge Solvent Used

4819.8 gallons

Total Purge Solvent Recovered (Assumed to be at least 95%)

4578.8 gallons

Net Usage (Used - Recovered)

241.0

2.77 gal x number of color changes = Amt Purge Used

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-May	
2-May	97
3-May	109
4-May	98
5-May	90
6-May	66
7-May	
8-May	
9-May	71
10-May	88
11-May	35
12-May	56
13-May	28
14-May	
15-May	
16-May	29
17-May	78
18-May	84
19-May	86
20-May	
21-May	
22-May	
23-May	82
24-May	86
25-May	84
26-May	87
27-May	103
28-May	
29-May	
30-May	
31-May	81
	1538

CN 31867

Total Purge Solvent Used

4260.3 gallons

Total Purge Solvent Recovered (Assumed to be at least 95%)

4047.2 gallons

Net Usage (Used - Recovered)

213.0

2.77 gal x number of color changes = Amt Purge Used

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Jun	66
2-Jun	100
3-Jun	101
4-Jun	
5-Jun	
6-Jun	68
7-Jun	72
8-Jun	78
9-Jun	12
10-Jun	
11-Jun	
12-Jun	
13-Jun	78
14-Jun	83
15-Jun	91
16-Jun	58
17-Jun	
18-Jun	
19-Jun	
20-Jun	71
21-Jun	72
22-Jun	55
23-Jun	55
24-Jun	69
25-Jun	
26-Jun	
27-Jun	49
28-Jun	67
29-Jun	59
30-Jun	62
	1366

CN 31867

Total Purge Solvent Used

3783.8 gallons

Total Purge Solvent Recovered (Assumed to be at least 95%)

3594.6 gallons

Net Usage (Used - Recovered)

189.2

2.77 gal x number of color changes = Amt Purge Used

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Jul	75
2-Jul	
3-Jul	
4-Jul	
5-Jul	80
6-Jul	97
7-Jul	95
8-Jul	86
9-Jul	
10-Jul	
11-Jul	71
12-Jul	109
13-Jul	103
14-Jul	89
15-Jul	84
16-Jul	
17-Jul	
18-Jul	90
19-Jul	77
20-Jul	107
21-Jul	82
22-Jul	97
23-Jul	
24-Jul	
25-Jul	54
26-Jul	116
27-Jul	82
28-Jul	77
29-Jul	92
30-Jul	
31-Jul	
	1763

CN 31867

Total Purge Solvent Used

4883.5 gallons

Total Purge Solvent Recovered (Assumed to be at least 95%)

4639.3 gallons

Net Usage (Used - Recovered)

244.2

2.77 gal x number of color changes = Amt Purge Used

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Aug	60
2-Aug	30
3-Aug	0
4-Aug	0
5-Aug	0
6-Aug	0
7-Aug	0
8-Aug	0
9-Aug	61
10-Aug	67
11-Aug	83
12-Aug	0
13-Aug	0
14-Aug	0
15-Aug	66
16-Aug	65
17-Aug	56
18-Aug	63
19-Aug	31
20-Aug	0
21-Aug	0
22-Aug	84
23-Aug	69
24-Aug	88
25-Aug	58
26-Aug	18
27-Aug	0
28-Aug	0
29-Aug	41
30-Aug	72
31-Aug	115
Total	1127

Total Purge Solvent Used	Units
3121.8	gallons

(2.77 gal x number of color changes =

Total Purge Solvent Recovered	Units
2965.7	gallons

(Assumed to be at least 95%)

Net Usage (Used - Recovered)	Units
156.1	gallons

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

= Amt Purge Used)

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Sep	93
2-Sep	74
3-Sep	0
4-Sep	0
5-Sep	0
6-Sep	94
7-Sep	88
8-Sep	84
9-Sep	38
10-Sep	0
11-Sep	0
12-Sep	95
13-Sep	80
14-Sep	54
15-Sep	66
16-Sep	0
17-Sep	0
18-Sep	0
19-Sep	83
20-Sep	74
21-Sep	77
22-Sep	83
23-Sep	0
24-Sep	0
25-Sep	0
26-Sep	89
27-Sep	71
28-Sep	78
29-Sep	89
30-Sep	0
Total	1410

Total Purge Solvent Used	Units
3905.7	gallons

(2.77 gal x number of color changes

Total Purge Solvent Recovered	Units
3710.4	gallons

(Assumed to be at least 95%)

Net Usage (Used - Recovered)	Units
195.3	gallons

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

= Amt Purge Used)

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Oct	0
2-Oct	0
3-Oct	59
4-Oct	71
5-Oct	56
6-Oct	22
7-Oct	0
8-Oct	0
9-Oct	0
10-Oct	71
11-Oct	63
12-Oct	83
13-Oct	81
14-Oct	29
15-Oct	0
16-Oct	0
17-Oct	78
18-Oct	71
19-Oct	61
20-Oct	81
21-Oct	83
22-Oct	0
23-Oct	0
24-Oct	76
25-Oct	59
26-Oct	77
27-Oct	62
28-Oct	72
29-Oct	0
30-Oct	0
31-Oct	76
Total	1331

Total Purge Solvent Used	Units
3686.9	gallons

(2.77 gal x number of color changes

Total Purge Solvent Recovered	Units
3502.5	gallons

(Assumed to be at least 95%)

Net Usage (Used - Recovered)	Units
184.3	gallons

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

= Amt Purge Used)

CN31867

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Nov	84
2-Nov	95
3-Nov	64
4-Nov	0
5-Nov	0
6-Nov	0
7-Nov	72
8-Nov	65
9-Nov	53
10-Nov	79
11-Nov	0
12-Nov	0
13-Nov	0
14-Nov	67
15-Nov	66
16-Nov	64
17-Nov	70
18-Nov	73
19-Nov	0
20-Nov	0
21-Nov	90
22-Nov	71
23-Nov	104
24-Nov	0
25-Nov	0
26-Nov	0
27-Nov	0
28-Nov	105
29-Nov	75
30-Nov	83
Total	1380

ADDED

Total Purge Solvent Used	Units
3822.6	gallons

(2.77 gal x number of color changes

Total Purge Solvent Recovered	Units
3631.5	gallons

(Assumed to be at least 95%)

Net Usage (Used - Recovered)	Units
191.1	gallons

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

= Amt Purge Used)

CN31867

Air Permit Compliance - Purge Calculation Worksheet

Date	Number of Color Changes
1-Dec	48
2-Dec	100
3-Dec	0
4-Dec	0
5-Dec	57
6-Dec	75
7-Dec	76
8-Dec	82
9-Dec	83
10-Dec	0
11-Dec	0
12-Dec	61
13-Dec	78
14-Dec	78
15-Dec	100
16-Dec	106
17-Dec	0
18-Dec	0
19-Dec	85
20-Dec	89
21-Dec	62
22-Dec	18
23-Dec	0
24-Dec	0
25-Dec	0
26-Dec	0
27-Dec	0
28-Dec	0
29-Dec	0
30-Dec	0
31-Dec	0
Total	1198

CN31867

Total Purge Solvent Used	Units
3318.5	gallons

(2.77 gal x number of color changes

Total Purge Solvent Recovered	Units
3152.5	gallons

(Assumed to be at least 95%)

Net Usage (Used - Recovered)	Units
165.9	gallons

Added to Emtrack 1/5/2023

Data is obtained from the production log provided by the robot technicians at the end of each day.

Air Permit Compliance - Purge Calculation Worksheet

= Amt Purge Used)