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

P037430901

FACILITY: PLASAN CARBON COMPOSITES		**SRN / ID:** P0374
LOCATION: 3195 WILSON DRIVE, WALKER		**DISTRICT:** Grand Rapids
CITY: WALKER		**COUNTY:** KENT
CONTACT: Brenda Wisniewski , Environmental Health and Safety Specialist		**ACTIVITY DATE:** 07/30/2015
STAFF: Kaitlyn DeVries	**COMPLIANCE STATUS:** Non Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: The purpose of this visit was to determine compliance with Permit to Install (PTI) No. 130-12A and all other applicable air rules and regulations.		
RESOLVED COMPLAINTS:		

On July 30, 2015 AQD Staff Denise Plafcan (DP) and Kaitlyn DeVries (KD) arrived at Plasan Carbon Composites (Plasan) located at 3195 Wilson Drive Walker, Michigan to conduct an announced scheduled inspection. DP notified Plasan of the inspection the afternoon before. The purpose of this visit was to determine compliance with Permit to Install (PTI) No. 130-12A and all other applicable air rules and regulations. This inspection was in follow up of the discussions and records collected by DP on July 10, 2015 at a meeting with Plasan Carbon Composites and their representatives (Please see activity report CA P037430146).

DP and KD arrived on site at approximately 8:45 am and observed the areas surrounding the facility. No odors, fugitive emissions, or opacity was observed. Upon entering the facility, staff met with Brenda Wisniewski, Environmental Health and Safety Specialist, and Gary Peters, attorney at Howard & Howard. The Environmental Inspections Rights and Responsibilities pamphlet was presented and briefly discussed. Ms. Wisniewski, Mr. Peters, and AQD Staff continued discussions about the applicability of the NESHAP 40 CFR Part 63 Subpart PPPP (4P) and the Individual HAP exceedance that occurred. It has been determined that Plasan was an affected area source that is now a major source subject to 4P. Ms. Wisniewski provided staff with information stating March 18, 2015 was the date the individual HAP (EB Acetate) limit of 9.0 tons, under PTI No. 130-12, was first exceeded. The newly permitted limit of 9.9 tons, under PTI No. 130-12A, was exceeded starting in April 2015. Plasan was also asked to provide an updated Potential to Emit (PTE) for EB Acetate. The PTE calculations indicate a small, but steady increase in the EB Acetate Emissions throughout the entire month of March. Please see attached.

Per 40 CFR 63 6(c)(5), the compliance date for this affected facility is March 18, 2015, the date at which the HAP limit was exceeded. Plasan was required to submit an initial notification no later than 120 days after "initial start-up". Please note, "initial start-up" is the date on which the HAP exceedance first occurred. Thus, the initial notification should have been received July 16, 2015. No initial notification was receive on or prior to July 16, 2015, thus a Violation Notice (VN) will be sent. AQD staff DP and KD spoke with Scott Throwe from USEPA Office of Enforcement and Compliance Assurance (see attached e-mail) regarding if the facility is considered an existing facility or a new facility. After speaking with Mr. Throwe, it was decided to treat Plasan as a new affected source, per subpart A, that will be complying with the existing source requirements. Per 40 CFR 63.4483 (c)(2), Plasan has one (1) year to become compliant with the standard. Thus, Plasan is required to be compliant with 4P no later than March 18, 2016.

In addition to Plasan being subject to 4P, they are now also subject to the Title V program. Plasan will be required to submit the necessary ROP application by March 18, 2016 to be compliant with Rule 210 (6) and the application submittal requirements for the Title V program.

Facility Description:

Plasan Carbon Composites manufactures carbon composite parts for high end automobiles. The majority of the parts are roof's and hoods. The facility's processes include: molding, sanding, trimming, gluing, washing, drying, and coating of these parts. The facility is currently operating 24 hours per day, 7 days per week and is continuing to grow and increase production. The facility is currently operating within one building, but has a second building located next door that will house EU-PAINTLINE-2 and will likely commence operations in September 2015. Further discussion of the new paint line and second building can be found below. There has been no indication of changes in any of the stacks, however, specific stack dimensions were not verified as part of this compliance inspection.

Compliance Evaluation:

Plasan has several sanding and shaving operations that are exempt under Rule 285 (l)(vi)(B) and some operations exempt under Rule 285 (l)(vi)(C), depending on the operation and location within the facility. Currently, the facility does not have any cold cleaners.

EUCARBONMOLD

Plasan is permitted for twelve (12) oil-heated molding presses with a 3.2 mmBtu/hr natural gas-fired boiler to heat the oil. Additionally, they have two (2) installed autoclaves and have room for a third. PTI 130-12A has the three (3) autoclaves included, as they are expecting to expand and need the third autoclave. Plasan currently has a material limit of 1,600,000 m^2/yr carbon sheets. As of June 2015 their 12-month rolling production is 1,380,417. Ms. Wisniewski asked staff about this condition, explaining that some of the carbon sheets molded do not proceed onto the coating operations as they are deemed defective, or are scrap. After verification with Julie Brunner, from AQD Permit Section, if Plasan would like this condition altered, they will need to submit a potential to emit (PTE) for the emissions from the coated parts and request an updated PTI for the limit of coated parts. The VOC content of mold release is limited to 6.4 lbs/gallon. Per the June 2015 records, Flex-Z 5.0 Mold release is 5.75 lbs/gallon VOC, and is the highest VOC content Mold Release/Mold Cleaner they use. Additionally, only the VOC-free Mold Cleaner (Chemlease) was used that month. The VOC emissions for EUCARBONMOLD is limited to 2.9 tpy; the highest VOC emissions is from April, 2015 at 0.3711 tons. The 12-month rolling is 0.889 tons. as of June 2015. All other applicable recordkeeping requirements were adequate. Additionally, all waste material appeared to be stored and handled properly.

EUADHESIVE

There are two adhesive areas located within the facility. The VOC and acetone limit for EUADHESIVE is 10 tpy 12-months rolling. As of June 2015, the VOC emissions are 3.159 tons. MDI isomer is limited to 0.34 lbs/day, and the highest reported use in June 2015 was June 3, where 0.159 lbs. was used. Plasan has requested, and been granted, use of manufacturers formulation data for VOC content. Plasan provided information regarding the VOC content of their adhesive, and it appears to be compliant with the limit of 0.24 lbs./gallon (minus water) as applied). Plasan also provided information regarding the VOC content of the primers, and per the attached MSDS's they appear to be compliant with the limit of 4.7 lbs/gallon. All other applicable recordkeeping requirements were adequate. Plasan also appeared to be using proper applicators. Additionally, Plasan does not reclaim any of its materials, rather disposes of any extra as waste. All waste materials appeared to be stored and handled properly.

FGPAINT

Plasan is permitted for two (2) paint lines with only one (1) in operation. Plasan plans to operate the second paint line (EU-PAINTLINE-2) in their second building, located just east of the main plant. Staff toured the second building to see the paint line. Presently, EU-PAINTLINE-2 is installed, but no other equipment is installed in the building. Per Ms. Wisniewski, Plasan plans to have that paint line in operation starting in September 2015. Ms. Wisniewski stated that half of the building will be used by another sector of Plasan, which will be making completely different parts than what is currently in production. DP explained the need for details stating the distinction between Plasan Carbon Composites and the other part of Plasan if they hope to have these be separate entities. Otherwise, they may need to incorporate the new part of Plasan into their Permits. Since EU-PAINTLINE-2 is not operational, it will not be evaluated in this report.

The VOC emissions are limited to 74.5 tpy, 12-Month rolling, and 596 lbs/day. The highest daily VOC emissions were 560.95 lbs. on June 23, 2015. The current 12-Month rolling as of June 2015 is 49.95 tons. Appropriate records are being kept for paint usage per day. Plasan has requested, and was granted, use of manufacturers data for VOC content. The VOC content of the primers is limited to 4.7 lbs/gallon and the VOC content of the clearcoats is limited to 4.5 lbs/gallon. Both the primer and clearcoat is mixed with an activator. Utilizing the same ratio's and calculations as done in the permit application and reviewed by the permit engineer and per the attached MSDS's they appear to be compliant.

P-chlorobenzotrifluoride is limited to 21.0 tpy, 12-month rolling. As of June 2015, the emissions were 10.08 tons. Other applicable recordkeeping information is adequate.

EU-PAINTLINE-1 had appropriately installed filters. Brett Vennemen, Paint Supervisor, showed staff HVLP applicators and test caps for both the robotic and manual portions of the paint line. Mr. Vennemen also stated that robot calibration and the test cap testing goes on the monthly operation reports. Mr. Vennemen also showed staff the temperature gauge and disc recorder for the cure oven. Section III. (4) of PTI No. 130-12A states that the cure oven portion of FGPAINT shall not be operated in excess of 194 °F. When inspected, the instantaneous reading of the cure oven indicated a temperature of 211 °F, while the disc recorder showed a temperature of 175 °F. When this was pointed out, Brett indicated that the probe for the continuous recorder was not properly inserted, and he would fix the probe position. Since the continuous monitor was not properly functioning at the time of the inspection, this will be included in the VN. The large temperature discrepancy facilitated further discussion between Ms. Wisniewski and AQD staff. Upon further review of the permit engineers permit memo and discussion with Permit Engineer, Julie Brunner, the condition to not exceed 194 °F was written for ease of recordkeeping. The staff memo states they may operate the cure portion of the oven in excess of 194 °F when curing primers, but not when curing clear coats. However, no indication of what was being coated is recorded, and the records indicate a temperature that exceeds 194 °F. This will be included in the VN. All other applicable recordkeeping was adequate.

All waste materials appeared to be properly handled and stored.

FGFACILITY

The VOC emissions for the facility are limited to 99.5 tpy, 12-Month rolling; as of June 2015 the emissions were 62.69 tons. Aggregate HAP's are limited to 24.9 tpy, while individual HAP's are limited to 9.9 tpy. As of June 2015, aggregate HAP's are 12.84 tons, and the highest individual HAP (EB Acetate) is 12.485 tons, and is unacceptable. In addition to the June individual HAP exceedance, the months of April and May 2015 also had exceedances of 10.036 tons and 11.192 tons, respectively. March 2015 had a reported EB Acetate emission of 9.310 tons, which violates the limit of 9 tons allowed under PTI No. 130-12, which was enforceable at that time. PTI No. 130-12A became effective April 21, 2015. Please note that the conditions for PTI No. 130-12A were accepted while already in violation of the outlined conditions. As such, the individual HAP exceedance of PTI No. 130-12 and of PTI No. 130-12A will be included in the VN.

Compliance Determination:

Based on the information provided, Plasan is not considered to be in compliance at the time of the inspection. A VN will be sent.

NAME Kimberly Dillon DATE 9.3.15 SUPERVISOR PAB