

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

P066158995

<b>FACILITY:</b> SUNSET ENTERPRISES HOLDINGS, LLC		<b>SRN / ID:</b> P0661
<b>LOCATION:</b> 2735 20TH STREET, PORT HURON		<b>DISTRICT:</b> Warren
<b>CITY:</b> PORT HURON		<b>COUNTY:</b> SAINT CLAIR
<b>CONTACT:</b> Zachary Jacques , Operations Manager		<b>ACTIVITY DATE:</b> 06/03/2021
<b>STAFF:</b> Rem Pinga	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Scheduled On-site Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On June 03, 2021, I conducted a scheduled on-site inspection at Sunset Enterprise Holdings, LLC, (Sunset) located at 2735 20<sup>th</sup> Street, Port Huron, Michigan 48060. The purpose of the inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451), the Administrative Rules, and the facility's Permit to Install No. 183-15. During the pre-inspection meeting, I met with Mr. Zachary Jacques (Zach), Operations Manager and facility contact. Mr. Jacques accompanied me during the walk-through inspection. I also met with Ronald Jacques, President, and Brian Jacques, Plant Manager.

PTI No. 183-15 was also issued as a synthetic minor permit to opt the facility out of the Clean Air Act of 1990, Title V, Renewable Operating Permit (ROP) requirements. This stationary source is not considered a major source of Hazardous Air Pollutant (HAP) emissions because the company has agreed to accept facility-wide single HAP and combined/aggregate HAPs emission restrictions, supported by monthly 12-month rolling total/s recordkeeping requirements, to demonstrate continued compliance as a HAP synthetic minor facility. Under PTI No. 183-15, FG-Facility, the facility is restricted to any single HAP emission regulated by the federal Clean Air Act, Section 112 to 8.9 tons per year and combined HAPs (aggregate HAPs) to 22.4 tons per year. The Volatile Organic Compounds (VOCs) are also restricted to 89.9 tons per year (tpy).

To comply with the COVID-19 Emergency AQD Field Inspection Guidance Update (June 2020), the inspection was announced and scheduled. I set up the inspection via a telephone call to Brian Jacques who referred me to Zach. At the site, no one was wearing mask and I did not get a temperature check. I entered the facility wearing a face mask, safety glasses, hard hat, and safety shoes. Following AQD guidance, all recordkeeping information were obtained through email instead of obtaining printed copies during inspection.

The facility coats automotive interior plastic parts and medical-use (non-automotive specialty products) specialty products parts. The applicable

requirements in PTI No. 183-15 are under the flexible group, FG-Coating. In addition, the opt-out/source-wide applicable requirements are under FG-Facility. FG-Coating includes 3 coating lines (EU-CoatingLine-01, EU-CoatingLine-02, and EU-CoatingLine-03). For EU-CoatingLine-01 and EU-CoatingLine-02, each line consists of one (1) flame treat/CO<sub>2</sub> pre-treatment cell, one (1) manual booth, two (2) automatic paint booths, flash-off area, and one (1) natural gas-fired conventional oven. EU-CoatingLine-03 consists of one (1) manual booth, flash-off area, and one (1) natural gas-fired conventional oven (shared with EU-CoatingLine-02) or natural gas-fired batch oven. During walk-through inspection, I observed that each spray booth has two applicators, for an easy transition between water based and solvent based coatings (basecoat, clear coat, and primer), but only one is used at a time. I observed that each booth has a two-stage particulate booth filters for particulate emissions control. According to Zach, emissions from purge and clean-up solvents and the paint mix room are included in the calculations for VOC and HAPs emissions.

The facility submitted a spreadsheet of coating use records that included VOC and HAPs monthly and monthly 12-month rolling total emissions. Per PTI No. 183-15, special condition FG-Coating (I.1), the submitted recordkeeping showed the highest monthly 12-month rolling total VOC emission rate for EU-CoatingLine-01 from January 2020 through April 2021 occurred in April 2021 at 3.6265 tons per year (tpy) and less than the 40.0 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.2), the submitted recordkeeping showed the highest monthly 12-month rolling total VOC emission rate for EU-CoatingLine-02 from January 2020 through April 2021 occurred in July 2021 at 6.2924 tons per year (tpy) and less than the 40.0 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.3), the submitted recordkeeping showed the highest monthly 12-month rolling total VOC emission rate for EU-CoatingLine-03 from January 2020 through April 2021 occurred in September 2021 at 0.6291 ton per year (tpy) and less than the 10.0 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.4), the submitted recordkeeping showed the highest monthly 12-month rolling total Dibasic Ester emission rate from January 2020 through April 2021 occurred in March 2020 at 0.0267 ton per year (tpy) and less than the 2.9 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.5), the submitted recordkeeping showed the highest monthly 12-month rolling total VOC emission rate for Ethylbenzene from January 2020 through April 2021 occurred in February 2020 at 0.0303 ton per year (tpy) and less than the 4.6 tpy permit limit. Per PTI No. 183-15, special condition FG-Coating (I.6), the submitted recordkeeping showed that the 8-hr. shift average of Isobutyl Acetate emission rate from January 2020 through April 2021, were mostly at less than 20 pounds/8-hour shift and less than the 153.6 pounds permit limit. Per PTI No. 183-15, special condition FG-Coating (II.1), the submitted recordkeeping showed the VOC content of air-dried coatings ranged from 0.72 through 4.49 lb./gal. as

