

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

P097271099

FACILITY: Northern Steel Services		SRN / ID: P0972
LOCATION: 11341 West Vienna Road, MONTROSE		DISTRICT: Lansing
CITY: MONTROSE		COUNTY: GENESEE
CONTACT: Matthew Galsterer , Purchasing Manager		ACTIVITY DATE: 03/15/2024
STAFF: Daniel McGeen	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced inspection, and subsequent review of recordkeeping. These were partial compliance evaluation (PCE) activities, part of a full compliance evaluation (FCE).		
RESOLVED COMPLAINTS:		

On March 15, 2024, the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an unannounced, scheduled inspection of Northern Steel Services. Recordkeeping was reviewed at a later date. These were partial compliance evaluation (PCE) activities, conducted as part of a full compliance evaluation (FCE).

Facility environmental contacts:

- Craig Bishop, Operations Manager; 734-762-7451; cbishop@northern-ss.com
- Matthew Galsterer, Purchasing Manager; 989-245-7037; mgalsterer@northern-ss.com

EGLE, AQD contact:

Dan McGeen, inspector; 517-648-7547; mcgeend@michigan.gov

Facility description:

This facility does metal fabrication. They cut and weld metal to assemble their products, and then prime and paint them in coating booths onsite.

Emission unit summary table:

Emission Units*	Emission Unit Description	Flexible Group ID**	Permit to Install (PTI) No.	Compliance Status
EUPAINTAREA1	Existing 2,500 square foot painting area, with a filtered air exhaust system, used to coat fabricated and structural steel.	FGCOATING	161-18	Compliance
EUPAINTAREA2	Existing 2,500 square foot painting area, with a filtered air exhaust system, used to coat fabricated and structural steel.	FGCOATING	161-18	Compliance

EUPAINTAREA3	Existing 3,000 square foot painting area, with a filtered air exhaust system, used to coat fabricated and structural steel.	FGCOATING	161-18	Noncompliance
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*An *emission unit* is any part of a stationary source that emits or has the potential to emit an air contaminant.

**A *flexible group* is used in a permit to install (PTI) or Renewable Operating Permit (ROP) to combine two or more emission units that have common or identical requirements.

Flexible Group Summary Table:

Flexible Group ID	Flexible Group Description	Associated Emission unit IDs	Compliance Status
FGCOATING	Three coating areas.	EUPAINTAREA1, EUPAINTAREA2, EUPAINTAREA3	Noncompliance
FGMETALPARTS	All metal parts coating lines source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.		Compliance
FGFACILITY	All process equipment source-wide including equipment covered by other permits, grand-fathered equipment and exempt equipment.		Compliance

Regulatory overview:

This facility has an opt-out permit, Permit to Install (PTI) No. 161-18, which contains limits to restrict the facility's PTE for hazardous air pollutants (HAPs), to prevent it from being a major HAPs source. A facility is major for HAPs if it has PTE of 10 tons per year (TPY) or more for a single HAP, or 25 TPY or more for aggregate HAPs. Northern Steel Services agreed to limits for individual HAPs and total HAPs in their PTI, to ensure that they operate as a minor, or *area source*, of HAP emissions. Major sources of HAPs are required to obtain a Renewable Operating Permit (ROP).

Note: PTI 161-18 also contains flexible group FGMETALPARTS, which covers all metal parts coating lines source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment. The emission limits in FGCOATING and FGMETALPARTS make the facility qualify for EGLE Michigan Air Pollution Control (MAPC) 621(10)(b), which exempts the coating areas from the coating content limits in Rule 621.

The facility is considered a true minor source for criteria pollutants, that is, pollutants for which National Ambient Air Quality Standards are set by the U.S. Environmental Protection Agency. The criteria pollutants include volatile organic compounds (VOCs), carbon monoxide, nitrogen oxides, sulfur dioxide, lead, particulate matter smaller than 10 microns (PM-10) and particulate matter smaller than 2.5 microns (PM2.5). A major source of criteria pollutants has the PTE to emit 100 TPY or more of one or more of those pollutants. Major sources of criteria pollutants are required to obtain a ROP.

Northern Steel Services has some metal working and welding processes which are considered exempt from the requirement of EGLE MAPC Rule 201 to obtain a PTI.

There is no boiler at this site. To meet the definition of a hot water heater under 40 CFR Part 63, Subpart JJJJJJ, National Emissions Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers Area Sources, the unit must be no more than 120 gallons in capacity. Northern Steel Services is said to have two electric hot water heaters on site, each one being less than 120 gallons in capacity. Because they are each less than 120 gallons in size, they are not subject, under Section 63.11195(f). However, they are also not subject because the rule only applies to fossil-fuel fired hot water heaters.

Northern Steel Services has previously determined that they are not subject to 40 CFR Part 63, Subpart XXXXXX, National Emissions Standards for Hazardous Air Pollutants (NESHAP): Area Source Standards for Nine Metal Fabricating and Finishing Source Categories, also known as 6X. This federal rule applies only to HAP area sources (e.g., minor sources of HAPs) which are primarily in one of 9 source categories. These 9 source categories are identified with 15 North American Industrial Classification System (NAICS) Codes, so the company can determine their applicability based on their facility's NAICS Code. Additionally, even if a source is within one of the 9 source categories, they are only subject to the rule if they use coatings containing specific HAP metals: compounds of cadmium, chromium, lead, manganese, and nickel, or any of these metals in the elemental form, with the exception of lead. Northern Steel Services determined that their coatings did not contain these heavy metals.

Northern Steel Services has no cold cleaners or vapor degreasers, nor do they have any non-solvent-based parts washers, because their steel arrives at the facility clean. They occasionally wipe metal down with rags and xylene, AQD has been advised.

Fee status:

This facility is considered a Category E fee-subject facility, because it has an opt-out permit, to restrict its potential to emit from making it a major source. Additionally, it is neither subject to a federal New Source Performance Standard regulation, nor a federal Maximum Achievable Control Technology standard.

The facility is required to submit an annual air emissions report to the AQD, which is currently done through MiEnviro.

Location:

- Address: 11341 W. Vienna Road, Montrose, 48457, Genesee County
- Description: The area is surrounded by a mix of residences and businesses. The nearest residence is directly across the street to the north. To the immediate east is an auto refinishing business, with a residence south of that. There are more residences further east, and residences to the west.

Past stack testing:

None required.

Previous inspections:

10/17/20219: Compliance.

Recent violations (within the past 2 years):

None.

Recent complaints (within the past 2 years):

None.

Operating schedule:

- Monday-Thursday 7:00-4:30
- Friday 7:00-11:00

Safety apparel required:

Company requirements for visitors are safety glasses and closed-toe footwear.

Odor evaluation:

An odor evaluation was conducted prior to arrival, as follows:

- Start time: 10:20 AM.
- Weather conditions: Overcast and 38 degrees F, winds out of N at 0-5 miles per hour (mph).
- Odors detected: There were no odors from Northern Steels Services, only a level 2 odor of wood smoke from a residence on Wilson Rd.
- Route taken: West on Vienna Rd., aka M-57, south on Duffield Rd., east on Wilson Rd., north on Nichols Rd., and west again on Vienna Rd. to the facility parking lot.

The AQD 0 to 5 odor scale is as follows:

0 - Non-Detect

1 - Just barely detectable

2 - Distinct and definite odor

3 - Distinct and definite objectionable odor

4 - Odor strong enough to cause a person to attempt to avoid it completely

5 - Odor so strong as to be overpowering and intolerable for any length of time

Arrival:

This was an unannounced inspection. AQD was represented by Dan McGeen, inspector.

- Arrival time: 10:31 AM.
- Weather conditions: Overcast and 38 degrees F, with wind out of N at 10 mph.
- Visible emissions detected: None.
- Odors detected: None.

D. McGeen entered the onsite office, and met with Matt Galsterer, Purchasing Manager, and with Craig Bishop, Purchasing Manager. D. McGeen had credentials available for identification, per AQD procedures, but is well known to the company. M. Galsterer accompanied D. McGeen during the inspection.

M. Galsterer showed D. McGeen their electronic recordkeeping system, which they have enhanced since the time of the 2019 inspection, to make it easier for plant employees to use. The daily operations data are entered into the recordkeeping system.

PCE activity No. 1: Inspection:

The facility was said to be doing production on this Friday morning but was finishing up when the AQD arrived onsite. During the walk-through inspection of the plant, a distinct and definite smell of fresh paint inside the 3 paint areas confirmed that production had just taken place.

PAINTAREA1 is served by stack 1 and EUPAINTAREA2 is served by stack 2. EUPAINTAREA3 can be subdivided into 2 smaller paint areas, which are served by their own stacks, 3 and 4.

Along with walking through the north plant, which contains EUPAINTAREA1 and EUPAINTAREA2, the AQD was shown the paint room for that building. Containers were sealed, as appropriate. In a waste room for the north plant, thinned paint was getting drained via a funnel from one container into a barrel of waste paint mixed with xylene. Nearby, a barrel of used xylene was stored, sealed.

Along with walking through the south plant, home to EUPAINTAREA3, the AQD was also shown the paint room for that building, and the waste room. All containers were sealed.

They do preventative maintenance on their air exhaust systems twice per year, M. Galsterer explained. They replaced a fan bearing this year, as the only issue of note. Fan belts are replaced if they squeak. Every Monday morning, they replace all of the mat/panel filters in their paint area, so today, Friday, the AQD would see the filters at their least clean.

The mat/panel filters in all 3 paint areas appeared to be in good condition, even with it being the end of the work week. The pressure drop gauges appeared to be in good condition, and are covered with a clear plastic film before paint is sprayed. This avoids the labor of cleaning paint off the faces of the gauges and avoids the use of solvents which would be involved in cleaning.

CHECKLIST FOR COMPLIANCE WITH PTI 161-18:

FGCOATING DESCRIPTION: Three coating areas.

Emission Units: EUPAINTAREA1, EUPAINTAREA2, EUPAINTAREA3

POLLUTION CONTROL EQUIPMENT: Particulate filter exhaust system for each paint area

Compliance check with special conditions (SC) of PTI 161-18 for FGCOATING:

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PTI 161-18 SC	Requirement	Comments	Complies?
FGCOATING SC I.1	VOC emissions are limited to 2,000 lbs/month for each coating area, including all associated purge and clean-up operations.	<ul style="list-style-type: none"> • EUPAINTAREA was below 2,000 lbs/month VOC. • EUPAINTAREA2 was below 2,000 lbs/month of VOC emissions. • EUPAINTAREA3, during May and June of 2023, had 2,055 lbs and 2,330 lbs of VOC emissions, respectively. These exceedances of 2,000 lbs/month eliminated for those two months the ability of the company to qualify for the MAPC Rule 621(10)(b) exemption from coating VOC content limits under Rule 621. 	No
FGCOATING SC I.2	VOC, acetone, tert-butyl acetate, and p-chlorobenzotrifluoride emissions combined are limited to 10 TPY per 12-month rolling time period as determined at the end of each calendar month for each coating area, including all associated purge and clean-up operations.	<ul style="list-style-type: none"> • EUPAINTAREA1: 4.75 tons combined (VOC only, as there were 0.00 tons of tert-butyl acetate and 0.00 tons of p-chlorobenzotrifluoride). • EUPAINTAREA2: 6.28 tons combined (VOC only, as there were 0.00 tons of tert-butyl acetate and 0.00 tons of p-chlorobenzotrifluoride). • EUPAINTAREA3: 8.78 tons combined (VOC only, as there were 0.00 tons of tert-butyl acetate and 0.00 tons of p-chlorobenzotrifluoride). 	Yes
FGCOATING SC I.3	Methyl isobutyl ketone emissions are limited to 50 lbs/day, for FGCOATING.	On no single day in 2023 did emissions of methyl isobutyl ketone (MIBK) exceed 50 lbs/day from FGCOATING. The main coatings used which contained MIBK were Kem Flash 500 Low Haps Primer Gray and Kem Flash 500 Low Haps Primer Light Gray.	Yes

FGCOATING II.	NA	NA	NA
FGCOATING SC III.1	The permittee shall capture all purge/clean-up solvents and waste coatings and shall store them in closed containers. The permittee shall dispose of all waste materials in an acceptable manner in compliance with all applicable state rules and federal regulations.	The north and south plant each have their own waste storage room. Used clean up solvent (xylene) was stored in sealed drums, and waste coatings were stored in their own drums. The AQD witnessed fresh waste paint being added to one drum via funnel, but the seals on all other drums were closed.	Yes
FGCOATING SC III.2	The permittee shall dispose of spent filters in a manner which minimizes the introduction of air contaminants to the outer air.	Spent filters from the particulate control systems are placed in a dumpster for proper disposal.	Yes
FGCOATING SC III.3	The permittee shall handle all VOC and / or HAP containing materials, including coatings, reducers, solvents and thinners, in a manner to minimize the generation of fugitive emissions. The permittee shall keep containers covered at all times except when operator access is necessary	The north plant and south plant each have their own paint storage room as well as a waste storage room. The AQD observed that VOC and/or HAP containing materials were stored in sealed drums. The only container that was not completely sealed was a drum which was receiving waste paint through a funnel at the time of the inspection.	Yes
FGCOATING SC III.4	The permittee shall keep the overhead doors located adjacent to the coating areas closed during all painting operations and for a half hour after painting operations are complete to minimize the generation of fugitive emissions.	The overhead doors were closed upon arrival when painting appeared to either be occurring or to be finishing up and they were still closed during the walk-through inspection, a half hour later.	Yes
FGCOATING SC IV.1	The permittee shall not operate any coating area in FGCOATING unless its particulate filter exhaust system	The banks of mat/panel filters were in good shape in each of the 3 paint areas. It was explained that they are replaced after every Friday, with this	Yes

	is installed, maintained and operated in a satisfactory manner.	being Friday morning. The pressure drop gauges appeared to be in good shape, and are protected from paint spray by a clear, removable film.	
FGCOATING SC IV.2	The permittee shall equip and maintain FGCOATING with high volume-low pressure (HVLP) spray applicators or comparable technology with equivalent transfer efficiency. For HVLP applicators, the permittee shall keep test caps available for pressure testing.	Air-assisted airless sprayers are used, and these are considered comparable technology with equivalent transfer efficiency. Test caps are not needed since these are not HVLP applicators.	Yes
FGCOATING SC V.	Records shall be maintained on file for a period of 5 years.	They keep records going back to the start of their operations in 2018, 6 years ago.	Yes
FGCOATING SC V.1	The permittee shall determine the VOC content, water content and density of any coating, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.	In a 7/16/2019 email, the company requested approval from the AQD to use manufacturer's formulation data in lieu of Method 24. In an 8/14/2019 letter, AQD approved the request.	Yes
FGCOATING SC VI.	Records shall be maintained on file for a period of 5 years.	They keep records going back to the start of their operations in 2018, 6 years ago.	Yes
FGCOATING SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any	The company enters the handwritten data from operator usage sheets into their database the next workday, and the spreadsheet automatically completes the calculations.	Yes

	monitoring/recordkeeping special condition		
FGCOATING SC VI.2	The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.	The company maintains both electronic and hardcopy versions of environmental data sheets (EDS), safety data sheets (SDS), and product data sheets (PDS). The hardcopy versions are kept in their shop, for immediate access by plant workers.	Yes
FGCOATING SC VI.3	The permittee shall keep the following information, for each coating area separately, on a monthly basis for FGCOATING:	Please see below.	See below
FGCOATING SC VI.3.a	Gallons (with water) of each material used.	The attached spreadsheets show both daily and monthly usage in gallons (with water) of each material used.	Yes
FGCOATING SC VI.3.b	Where applicable, gallons (with water) of material reclaimed.	NA, as the attached spreadsheets show no materials being reclaimed.	NA
FGCOATING SC VI.3.c	VOC content (with water), acetone content, tert-butyl acetate content and p-chlorobenzotrifluoride content in pounds per gallon, of each material as applied.	The attached spreadsheets included VOC content of the coatings (with and without water and exempt solvents) as applied, and content of specific HAPs but not acetone, tert-butyl acetate, or p-chlorobenzotrifluoride content. M. Galsterer confirmed on 3/26/2024 that there was no usage of any material containing those compounds.	Yes

FGCOATING SC VI.3.d	VOC, acetone, tert-butyl acetate and p-chlorobenzotrifluoride mass emission calculations determining the monthly emission rate in tons per calendar month.	The attached spreadsheets included mass emission calculations for VOC. There were no reported emissions of acetone, tert-butyl acetate and p-chlorobenzotrifluoride, because these compounds were not used.	Yes
FGCOATING SC VI.3.e	VOC, acetone, tert-butyl acetate and p-chlorobenzotrifluoride combined mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.	The attached spreadsheets show the company is keeping mass emission calculations determining the annual emission rate in tons per 12-month rolling time period of VOCs, but there were no reported emissions from acetone, tert-butyl acetate and p-chlorobenzotrifluoride, because these compounds were not used. The records were kept using mass balance, in an acceptable format.	Yes
FGCOATING SC VI.4	The permittee shall keep the following information on a calendar day basis for FGCOATING:	Please see below.	See below
FGCOATING SC VI.4.a	Gallons (with water) of each methyl isobutyl ketone containing material used.	The attached spreadsheet showed gallons (with water) of each MIBK containing material used.	Yes
FGCOATING SC VI.4.b	Where applicable, gallons (with water) of each methyl isobutyl ketone containing material reclaimed.	NA, as no MIBK containing material was reclaimed.	NA
FGCOATING SC VI.4.c	Methyl isobutyl ketone content in pounds per gallon, of each material as applied.	The attached spreadsheets show MIBK content in pounds per gallon.	Yes

FGCOATING SC VI.4.d	<p>Methyl isobutyl ketone mass emission calculations determining the daily emission rate in pounds per calendar day.</p> <p>The permittee shall keep the records using mass balance or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.1</p>	<p>The attached spreadsheets provide MIBK mass emission calculation results in lbs/day.</p> <p>The records were kept using mass balance, in an acceptable format.</p>	Yes
FGCOATING SC VII.	NA	NA	NA
FGCOATING SC VIII.	The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:	Please see below.	See below
FGCOATING SC VIII.1	Stack SV-1 shall have a maximum diameter of 26 inches and a minimum height above ground level of 26.5 feet.	This stack appeared to be of the appropriate dimensions.	Yes
FGCOATING SC VIII.2	Stack SV-2 shall have a maximum diameter of 26 inches and a minimum height above ground level of 26.5 feet.	This stack appeared to be of the appropriate dimensions.	Yes
FGCOATING SC VIII.3	Stack SV-3 shall have a maximum diameter of 26 inches and a minimum height above ground level of 29 feet.	This stack appeared to be of the appropriate dimensions.	Yes
FGCOATING SC VIII.4	Stack SV-4 shall have a maximum diameter of 26 inches and a minimum height above ground level of 29 feet.	This stack appeared to be of the appropriate dimensions.	Yes

FGCOATING SC IX.	NA	NA	NA
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FGMETALPARTS DESCRIPTION: All metal parts coating lines source-wide including equipment covered by other permits, grandfathered equipment and exempt equipment.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT: NA

Compliance check with SC of PTI 161-18 for FGMETALPARTS:

PTI 161-18 SC	Requirement	Comments	Complies?
FGMETALPARTS SC I.1	VOC emissions are limited to < 30 TPY over a 12-month rolling time period as determined at the end of each calendar month, for all metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10) (b).	As of 12/31/2023, 12-month rolling emissions in tons from the 3 paint areas were: EUPAINTAREA1: 4.75 TPY VOC EUPAINTAREA2: 6.28 TPY VOC EUPAINTAREA3: 8.78 TPY VOC FGFACILITY: 19.81 tons VOC total, below the limit	Yes
FGMETALPARTS II.	NA	NA	NA
FGMETALPARTS SC III	NA	NA	NA
	NA	NA	NA

FGMETALPARTS SC IV			
FGMETALPARTS SC V.	Records shall be maintained on file for a period of 5 years.	They keep records going back to the start of their operations in 2018, 6 years ago.	Yes
FGMETALPARTS SC V.1	The permittee shall determine the VOC content, water content, and density of any coating used to coat metal parts, as applied and as received, using federal Reference Test Method 24. Upon prior written approval by the AQD District Supervisor, the permittee may determine the VOC content from manufacturer's formulation data. If the Method 24 and the formulation values should differ, the permittee shall use the Method 24 results to determine compliance.	In a 7/16/2019 email, the company requested approval from the AQD to use manufacturer's formulation data in lieu of Method 24. In an 8/14/2019 letter, the AQD approved the request.	Yes
FGMETAL PARTS SC VI.	Records shall be maintained on file for a period of 5 years.	They keep records going back to the start of their operations in 2018, 6 years ago.	Yes
FGMETALPARTS SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the last day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	The company enters the handwritten data from operator usage sheets into their database the next workday, and the spreadsheet automatically completes the calculations.	Yes
FGMETALPARTS SC VI.2	The permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating and reducer including the weight percent of each component. The data may consist of Safety Data Sheets, manufacturer's formulation data, or	The company maintains both electronic and hardcopy versions of environmental data sheets (EDS), safety data sheets (SDS), and product data sheets (PDS). The	Yes

	both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.	hardcopy versions are kept in their shop, for immediate access by plant workers.	
FGMETALPARTS SC VI.3	The permittee shall keep the following information on a monthly basis for all metal parts coating lines source-wide, including metal parts coating lines covered by other permits, which are exempted by R 336.1621(10)(b):	Please see below:	See below
FGMETALPARTS SC VI.3.a	Gallons or pounds of each VOC containing material used.	The attached spreadsheets showed on a monthly basis both gallons and lbs of each VOC containing material used.	Yes
FGMETALPARTS SC VI.3.b	VOC content, in pounds per gallon or pounds per pound as applied, of each VOC containing material used.	The attached spreadsheets showed VOC content in lbs/gal of each VOC containing material used.	Yes
FGMETALPARTS SC VI.3.c	VOC emission calculations determining the monthly emission rate in tons per calendar month.	The attached spreadsheets included the VOC monthly emission rate in tons per calendar month.	Yes
FGMETALPARTS SC VI.3.d	VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month. The permittee shall keep the records using mass balance, or an alternative method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make	The attached spreadsheets included calculated VOC emissions in tons per 12-month rolling time period. The records were kept using mass balance, in an acceptable format.	Yes

	them available to the Department upon request		
FGMETALPARTS SC VII.	NA	NA	NA
FGMETALPARTS SC VIII.	NA	NA	NA
FGMETALPARTSSC IX.	NA	NA	NA

FGFACILITY

POLLUTION CONTROL EQUIPMENT: NA

Compliance check with SC of PTI 161-18 for FGFACILITY:

PTI 161-18 SC	Requirement	Comments	Complies?
FGFACILITY SC I.1	Emissions of each individual HAP are limited to < 8.9 TPY per 12-month rolling time period as determined at the end of each calendar month, for FGFACILITY.	Emissions of each individual HAP were well below 8.9 TPY for FGCOATING. The highest emitting HAP was xylene, for which emissions were as follows: EUPAINTAREA1: 0.61 TPY xylene EUPAINTAREA2: 0.44 TPY xylene	Yes

		<p>EUPAINTAREA3:</p> <p>0.87 TPY xylene</p> <p>FGFACILITY total: 1.92 TPY xylene, below limit</p>	
<p>FGFACILITY SC I.2</p>	<p>Emissions of aggregate HAPs are limited to < 22.4 TPY per 12-month rolling time period as determined at the end of each calendar month, for FGFACILITY.</p>	<p>Aggregate (total) 12-month rolling HAPs as of 12/31/2023:</p> <p>EUPAINTAREA1: 1.13 TPY</p> <p>EUPAINT AREA2: 0.99 TPY</p> <p>EUPAINTAREA3: 1.79 TPY</p> <p>FGFACILITY total: 3.91 TPY, below the limit</p>	<p>Yes</p>
<p>FGFACILITY SC I.3</p>	<p>Emissions of methyl isobutyl ketone are limited to 5.0 TPY per 12-month rolling time period as determined at the end of each calendar month, for FGFACILITY.</p>	<p>For MIBK, emissions were as follows:</p> <p>EUPAINTAREA1: 0.14 TPY</p> <p>EUPAINTAREA2: 0.11 TPY</p> <p>EUPAINTAREA3: 0.21 TPY</p> <p>FGFACILITY total: 0.46 TPY, below the limit</p>	<p>Yes</p>
<p>FGFACILITY SC I.4</p>	<p>Emissions of cumene are limited to 600 lbs/year per 12-month rolling time period as determined at the end of each calendar month, for FGFACILITY.</p>	<p>For cumene, there was zero usage in 2023. Emissions were as follows:</p> <p>EUPAINTAREA1: 0.00 TPY</p> <p>EUPAINTAREA2: 0.00 TPY</p> <p>EUPAINTAREA3: 0.00 TPY</p> <p>FGFACILITY total: 0.00 TPY, below the limit</p>	<p>Yes</p>
<p>FGFACILITY SC I.5</p>	<p>Emissions of ethyl benzene are limited to 1.2 TPY 12-month rolling time period as determined at the end of each calendar month, for FGFACILITY.</p>	<p>For ethyl benzene, emissions were as follows:</p> <p>EUPAINTAREA1: 0.16 TPY</p>	<p>Yes</p>

		<p>EUPAINTAREA2: 0.13 TPY</p> <p>EUPAINTAREA3: 0.25 TPY</p> <p>FGFACILITY total: 0.54 TPY, below the limit</p>	
FGFACILITY SC I.6	Emissions of styrene are limited to 5.0 TPY per 12-month rolling time period as determined at the end of each calendar month, for FGFACILITY.	<p>For styrene, emissions were as follows:</p> <p>EUPAINTAREA1: 0.23 TPY</p> <p>EUPAINTAREA2: 0.20 TPY</p> <p>EUPAINTAREA3: 0.36 TPY</p> <p>FGFACILITY total: 0.79 TPY, below the limit</p>	Yes
FGFACILITY II.	NA	NA	NA
FGFACILITY SC III.	NA	NA	NA
FGFACILITY SC IV.	NA	NA	NA
FGFACILITY SC V.	Records shall be maintained on file for a period of 5 years.	They keep records going back to the start of their operations in 2018, 6 years ago.	Yes
FGFACILITY SC V.1	The permittee shall determine the HAP content of any material as received and as applied, using manufacturer's formulation data. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.	They determine HAP content using manufacturer's formulation data.	Yes
FGFACILITY SC V.	Records shall be maintained on file for a period of 5 years.	They keep records going back to the start of their operations in 2018, 6 years ago.	Yes

FGFACILITY SC VI.1	The permittee shall complete all required calculations in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month, unless otherwise specified in any monitoring/recordkeeping special condition.	The company enters the handwritten data from operator usage sheets into their database the next workday, and the spreadsheet automatically completes the calculations.	Yes
FGFACILITY SC VI.2	The permittee shall maintain a current listing from the manufacturer of the chemical composition of each material, including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.	The company maintains both electronic and hardcopy versions of environmental data sheets (EDS), safety data sheets (SDS), and product data sheets (PDS). The hardcopy versions are kept in their shop, for immediate access by plant workers.	Yes
FGFACILITY SC VI.3	The permittee shall keep the following information on a calendar month basis for FGFACILITY:	Please see below.	See below
FGFACILITY SC VI.3.a	Gallons or pounds of each HAP containing material used.	The attached spreadsheets included the gallons of each HAP containing material used.	Yes
FGFACILITY SC VI.3.b	Where applicable, gallons or pounds of each HAP containing material reclaimed.	NA, as no HAP containing materials were reclaimed.	NA
FGFACILITY SC VI.3.c	HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.	The attached spreadsheets included HAP content in lbs/gal of each HAP containing material used.	Yes
FGFACILITY SC VI.3.d	Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.	The attached spreadsheets include individual and aggregate HAP emissions in tons per calendar month.	Yes

FGFACILITY SC VI.3.e	<p>Individual and aggregate HAP emission calculations determining the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.</p> <p>The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request</p>	<p>The attached spreadsheets included calculated individual and aggregate HAP emissions in tons per 12-month rolling time period.</p> <p>The records were in an acceptable format. They were made available to the AQD during the inspection and were submitted as part of the facility's annual emissions report.</p>	Yes
FGFACILITY SC VI.4	The permittee shall keep the following information on a calendar month basis for FGFACILITY:	Please see below.	See below
FGFACILITY SC VI.4.a	Gallons of each methyl isobutyl ketone containing material used.	The attached spreadsheets included the gallons of each MIBK containing material used.	Yes
FGFACILITY SC VI.4.b	Where applicable, gallons of each methyl isobutyl ketone containing material reclaimed.	NA, as no MIBK containing materials were reclaimed.	NA
FGFACILITY SC VI.4.c	The methyl isobutyl ketone content, in pounds per gallon of each methyl isobutyl ketone containing material used.	The attached spreadsheets included the MIBK content in lbs/gal of each MIBK containing material used.	Yes
FGFACILITY SC VI.4.d	Methyl isobutyl ketone emission calculations determining the monthly emission rate in tons per calendar month.	The attached spreadsheets included calculated monthly MIBK emissions in tons per calendar month.	Yes
FGFACILITY SC VI.4.e	Methyl isobutyl ketone emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.	The attached spreadsheets included the annual MIBK emission rate in tons per 12-month rolling period.	Yes

	<p>The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.</p>	<p>The records were made available to the AQD during the inspection and were submitted as part of the facility's annual emissions report.</p>	
FGFACILITY SC VI.5	<p>The permittee shall keep the following information on a calendar month basis for FGFACILITY:</p>	<p>Please see below.</p>	<p>See below</p>
FGFACILITY SC VI.5.a	<p>Gallons of each cumene containing material used.</p>	<p>The attached spreadsheets included the gallons of each cumene containing material used, which was 0.00 gal in 2023.</p>	<p>Yes</p>
FGFACILITY SC VI.5.b	<p>Where applicable, gallons of each cumene containing material reclaimed.</p>	<p>NA, as no cumene containing materials were reclaimed.</p>	<p>NA</p>
FGFACILITY SC VI.5.c	<p>The cumene content, in pounds per gallon of each cumene containing material used</p>	<p>NA, as there was no cumene containing material used in 2023.</p>	<p>NA</p>
FGFACILITY SC VI.5.d	<p>Cumene emission calculations determining the monthly emission rate in pounds per calendar month.</p>	<p>NA, as there was no cumene containing material used in 2023.</p>	<p>NA</p>
FGFACILITY SC VI.5.e	<p>Cumene emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month.</p> <p>The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.</p>	<p>NA, as there was no cumene containing material used in 2023.</p>	<p>NA</p>

<p>FGFACILITY SC VI.6</p>	<p>The permittee shall keep the following information on a calendar month basis for FGFACILITY:</p>	<p>Please see below.</p>	<p>See below</p>
<p>FGFACILITY SC VI.6.a</p>	<p>Gallons of each ethylbenzene containing material used.</p>	<p>The attached spreadsheets included the gallons of each ethyl benzene containing material used.</p>	<p>Yes</p>
<p>FGFACILITY SC VI.6.b</p>	<p>Where applicable, gallons of each ethylbenzene containing material reclaimed.</p>	<p>NA, as no ethylbenzene containing materials were reclaimed.</p>	<p>NA</p>
<p>FGFACILITY SC VI.6.c</p>	<p>The ethylbenzene content, in pounds per gallon of each ethylbenzene containing material used.</p>	<p>The attached spreadsheets included the ethylbenzene content in lbs/gal of each ethylbenzene containing material used.</p>	<p>Yes</p>
<p>FGFACILITY SC VI.6.d</p>	<p>Ethylbenzene emission calculations determining the monthly emission rate in tons per calendar month.</p>	<p>The attached spreadsheets included calculated monthly ethylbenzene emissions in tons per calendar month.</p>	<p>Yes</p>
<p>FGFACILITY SC VI.6.e</p>	<p>Ethylbenzene emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.</p> <p>The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.</p>	<p>The attached spreadsheets included the annual ethylbenzene emission rate in tons per 12-month rolling period.</p> <p>The format was acceptable. The records were made available to the AQD during the inspection and were submitted as part of the facility's annual emissions report.</p>	<p>Yes</p>

FGFACILITY SC VI.7	The permittee shall keep the following information on a calendar month basis for FGFACILITY:	Please see below.	See below
FGFACILITY SC VI.7.a	Gallons of each styrene containing material used.	The attached spreadsheets included the gallons of each styrene containing material used.	Yes
FGFACILITY SC VI.7.b	Where applicable, gallons of each styrene containing material reclaimed.	NA, as no styrene containing materials were reclaimed.	NA
FGFACILITY SC VI.7.c	The styrene content, in pounds per gallon of each styrene containing material used.	The attached spreadsheets included the styrene content in lbs/gal of each styrene containing material used.	Yes
FGFACILITY SC VI.7.d	Styrene emission calculations determining the monthly emission rate in pounds per calendar month.	The attached spreadsheets included calculated monthly styrene emissions in tons per calendar month.	Yes
FGFACILITY SC VI.7.e	Styrene emission calculations determining the annual emission rate in pounds per 12-month rolling time period as determined at the end of each calendar month. The permittee shall keep records using mass balance or an alternate method and format acceptable to the AQD District Supervisor. The permittee shall keep all records on file and make them available to the Department upon request.1	The attached spreadsheets included the annual styrene emission rate in tons per 12-month rolling period. The format was acceptable. The records were made available to the AQD during the inspection and were submitted as part of the facility's annual emissions report.	Yes
	NA	NA	NA

FGFACILITY SC VII.			
FGFACILITY SC VIII.	NA	NA	NA
FGFACILITY IX.	NA	NA	NA

(End of compliance check with PTI 161-18.)

Departure:

- Time of departure: 11:49 AM.
- Odors detected: None.
- Visible emissions detected: None.

PCE activity No. 2: Review of facility recordkeeping:

This PCE activity was conducted on days subsequent to the 3/15/2024 inspection. the results of the record review are reflected in the PTI compliance checklist tables earlier in this report.

Note: In the attached spreadsheets for the 2023 calendar year, the year is listed as '07. The spreadsheet the company used was made for the regulated community to use years ago, by what was then the Michigan Department of Environmental Quality (now EGLE), and the year 2007 appears to have been simply an artifact of the spreadsheet.

Compliance concerns:

The only compliance concerns identified were as follows:

- In May and June of 2023, EUPAINTAREA3 had VOC emissions of 2,055 lbs and 2,330 lbs, respectively. PTI 161-18, FGCOATING, SC I.1 limits each coating area to 2,000 lbs of VOC per month. A Violation Notice (VN) will be sent. Because the company exceeded the 2,000 lbs/month limit which exempted it from the VOC content requirements of MAPC Rule 621, it will be necessary for the company to determine if during those months of May and June 2023 they exceeded the VOC content limits for any of their coatings. That would constitute an additional violation.

Conclusion:

Two instances of noncompliance were found. For EUPAINTAREA3, during May and June of 2023, 2,055 lbs and 2,330 lbs of VOC emissions were reported, respectively, over the 2,000 lbs/month VOC limit. A VN will be sent, and the company will be asked to determine if they also exceeded VOC.

content limits in the coatings used during those two months, when they did not qualify for exemption from the MAPC Rule 621 requirements for coatings.

NAME *David [Signature]*

DATE 4/8/2024

SUPERVISOR *RB*