

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

P101954839

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| FACILITY: Ground Effects, LLC | | SRN / ID: P1019 |
| LOCATION: 1990 Concept Drive, WARREN | | DISTRICT: Warren |
| CITY: WARREN | | COUNTY: MACOMB |
| CONTACT: Michael Tohlman , Plant Manager | | ACTIVITY DATE: 08/27/2020 |
| STAFF: Rem Pinga | COMPLIANCE STATUS: Compliance | SOURCE CLASS: Synthetic Minor |
| SUBJECT: Scheduled Level 2 Inspection | | |
| RESOLVED COMPLAINTS: | | |

On August 27, 2020, I conducted a level 2 scheduled inspection at Ground Effects, LLC, located at 1990 Concept Drive, Warren, Michigan 48001. 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. 69-19.

PTI No. 69-19 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. 69-19, FGFACILITY, the facility is restricted to a potential to emit of any single HAP regulated by the federal Clean Air Act, Section 112 to less than 8.9 tons per year and a potential to emit of all HAPs combined (aggregate HAPs) to less than 22.4 tons per year.

To comply with the COVID-19 Emergency AQD Field Inspection Guidance Update (June 2020), the inspection was announced and scheduled. Mr. Michael Tohlman, Plant Manager, Mr. Allen Kinsler, Environmental Engineer, and Mr. Brooks Pattison, Environmental Systems Manager, attended the pre-inspection meeting and accompanied me during the walk-through inspection. I was met at the main entrance by Mr. Tohlman. I adhered to the facility's COVID-19 safety protocols such as temperature check at the main building entrance and completing an electronic checklist/questionnaire of health/contact information which was accessed utilizing my office issued mobile phone. I requested and obtained an email copy of the filled form. I entered the facility wearing my personal face mask, face shield, safety glasses, hard hat, and safety shoes. Following AQD guidance, all recordkeeping information were obtained through email instead of obtaining printed copies during inspection.

Ground Effects, LLC installs polyurethane liners on vehicles through a 2-component coating process. Per Mr. Tohlman, the facility's primary customer is FCA and currently coats Durango, Jeep, and light duty trucks at this facility. During

the walk-through inspection, I observed the facility conducting work on light duty trucks.

During the pre-inspection meeting, I reiterated the purpose of the inspection including the need to follow the COVID-19 Emergency AQD Field Inspection Guidance. I also discussed the electronic records Mr. Kinsler emailed to me prior to the inspection and requested for additional records such as SDS sheets, improved recordkeeping of HAPs, and recordkeeping to show compliance with AQD Administrative R 336.1290 (Rule 290) exemption from permit to install requirements. I found out during inspection that the facility operated the process using Rule 290 exemption prior to obtaining PTI No. 69-19 last July 8, 2019. Mr. Kinsler informed me that the records I obtained were the only records the facility kept which showed data from 2017.

Ground Effects, LLC obtained Permit to Install No. 69-19 for 3 coating lines (EU-CoatingLn-1, EU-CoatingLn-2, and EU-CoatingLn-3), each with a heated spray booth for polyurethane coating of vehicle beds. The process starts with the pre-coating preparation/masking stage where the vehicle is washed, dried, and then cleaned manually with inbound cleaning solvents and taped to prevent overspray coating of vehicle exterior surfaces such as the main cab in a truck and exterior bed surfaces. Next, the vehicle goes through the customization stage such as installation of graphics, decals, foot pedals, etc., prior to the spray booth. At the booth, a bonding agent (primer) is first coated followed by a two-component coating application of the polyurethane bed liner by automated spray process. Following the application of the polyurethane bed liner, the vehicle is cleaned for overspray with an outbound cleaning solvent outside the booth and then air dried. The trucks are inspected for defects and pulled out for repairs at this stage. For specialty vehicles, customization occurs at this stage such as installation of additional decals, rails, covers, etc., followed by removal of masking tape and quality inspection. The vehicle undergoes a second inspection prior to transport to a north lot for storage and ready for shipment to customers.

The facility submitted a spreadsheet of coating use records that included VOC and HAPs monthly and 12-month rolling total emissions prior to the onsite inspection. Additional records that were submitted electronically after the onsite inspection included Safety Data Sheets of coatings and the revised spreadsheet that I requested. As mentioned earlier, the coating use records were from 2017 through July 2020. During onsite inspection, I was informed that the facility started operations in 2010. I inquired about additional records to show compliance with Rule 290 and I was informed that facility kept records only from 2017. It appeared that prior to obtaining PTI No. 69-19, the facility was non-compliant with Rule 290 permit to install exemption thus also non-compliant with Rule 201.

Currently, the facility keeps records to comply with PTI No. 69-19. Per PTI No. 69-19, special condition FG-CoatingLns (I.1), the submitted recordkeeping showed the

highest monthly 12-month rolling total VOC emission rate from January through July 2020 occurred in February 2020 at 12.6 tons per year (tpy) and less than the 26.0 tpy permit limit. Per PTI No. 69-19, special condition FG-CoatingLns (II.1), the material safety data sheet for the Bonding Agent showed the VOC content was 1.56 lb./gal. and complies with the 1.60 lb./gal. permit limit. Per PTI No. 69-19, special condition FG-CoatingLns (III), I observed closed coatings/solvent in closed containers, purge and clean up solvents are recovered and disposed properly with the facility taking credits for recovered solvents in recordkeeping. Per PTI No. 69-19, special condition FG-CoatingLns (IV.1 & 2), I observed filters in place at the booths and the facility using robotic bell applicators for better transfer efficiency. Per PTI No. 69-19, special condition FG-CoatingLns (VI), the facility kept records of Safety Data Sheets, gallons of material used, VOC contents, monthly VOC mass emission rates, and monthly 12-month rolling total VOC emission rates. Per PTI No. 69-19, special condition FGFACILITY (I.1), records showed Methanol as the highest individual HAP emission from January through July 2020. The highest monthly 12-month rolling total Methanol emission rate during this time frame occurred in February at 2.27 tpy and less than the 8.9 tpy permit limit. Per PTI No. 69-19, special condition FGFACILITY (I.2), the highest monthly 12-month rolling total aggregate HAPs emission rate from January through July 2020 occurred in February at 2.36 tpy and less than the 22.4 tpy permit limit. Per PTI No. 69-19, special condition FGFACILITY (VI), the facility kept records of gallons of HAP containing material, monthly individual and aggregate HAPs, and monthly 12-month rolling total individual and aggregate HAPs.

The facility appeared to be in compliance with the applicable requirements in PTI No. 69-19 and I did not find any noncompliance issues during the walk-through inspection. As far as the previous non-compliance with permit to install, the facility already corrected it by obtaining PTI No. 69-19.

NAME 

DATE September 3, 2020 SUPERVISOR 