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

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FACILITY: Advanced Architect	ural Products	SRN / ID: P1129
LOCATION: 959 Industrial Driv	e, ALLEGAN	DISTRICT: Kalamazoo
CITY: ALLEGAN		COUNTY: ALLEGAN
CONTACT: Alex Sunnerville,		ACTIVITY DATE: 06/26/2023
STAFF: Cody Yazzie	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Onsite Inspection		•
RESOLVED COMPLAINTS:		

On June 26, 2023 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 959 Industrial Drive, Allegan Michigan at 2:15 PM to conduct an unannounced air quality inspection of Advanced Architectural Products (Allegan) (hereafter A2P Allegan) SRN (P1129). Staff made initial contact with Alex Sunnerville and stated the purpose of the visit. Mrs. Sunnerville accommodating Staff throughout the inspection escorting them around the facility. Vince Smith, A2P was identified as a contact that could help with additional records for the facility regarding maintenance and use of the emergency generator.

A2P Allegan is the location of corporate offices. There are plans to operate a fiberglass pultrusion line at this location, which is the reason that the facility has applied and been issued PTI No. 58-20. A2P also has Hamilton location which does most of the fiberglass pultrusion. A2P produces fiberglass girts, which are horizontal members inside framed walls to hold insulations panels in place. This location also has Wolverine Enclosures that operates in the same building. Wolverine Enclosures produces aluminum composite panels for construction buildings. Both businesses are owned by Matt Krause. These businesses appear to be a part of the same stationary source.

A2P has never been inspected by the AQD and received their Air Permit PTI No. 58-20 on August 10, 2020. Staff asked, and Mrs. Sunnerville stated that the facility does not have any boilers or cold cleaners.

Mrs. Sunnerville gave staff a tour of the facility. Required personal protective equipment are safety glasses, steel toe boots, and hearing protection. Staff observations and review of records provided during and following the inspection are summarized below:

## PTI No. 58-20:

This PTI was issued on August 10, 2020. This PTI was for a dual cavity pultrusion line that included three emission units. The emissions units are EUMIXING, EULINE1, and EUSAWING. The process would be similar to that which is utilized at the A2P Hamilton facility. When Staff arrived for the inspection construction/installation of the pultrusion line had not commenced. Staff was shown the area in which the facility intends to install the line. Staff was informed that A2P intended to install the pultrusion line in 2024/2025.

During the inspection Staff stated to Mrs. Sunnerville that Rule 201(4) states the following: "If the installation, reconstruction, or relocation of the equipment, for which a permit has been issued, has not commenced within, or has been interrupted for 18 months, then the permit to install shall become void, unless either of the following occurs: (a) the permit to install specifies a termination date of more than 18 months. (b) the permit to install is subject of a formal appeal

by a party other than the owner or operator of the process or process equipment that is subject of the permit, in which case the termination is not later than 18 months after the effective date of the permit plus the number of days between the date on which the permit was appealed and the date on which all appeals concerning the permit have been resolved.". Neither (a) or (b) conditions of Rule 201(4) appeared to have occurred, which means the PTI No. 58-20 would be voided February 18, 2022. Staff observing no construction or installation being commenced PTI No. 58-20 appears void.

Staff indicated to Mrs. Sunnerville that if the facility intends to still install a pultrusion line at the A2P Allegan Facility then they must first reapply for a new PTI before construction/installation beings.

#### **Metal Fabrication:**

The facility has multiple metal fabrication equipment such as drills, saws, machining, and grinding machines. All these units either are only released to the general in-plant environment or first route to a filter unit that then only releases to the general in-plant environment. These operations appear to be permit exempt per Rule 285(2)(I)(vi)(B). Wolverine Enclosures is the business that utilizes these operations.

### **Emergency Generator:**

The facility does have a 22kW Honeywell (Generac) generator (Model-G0070630). The generator only has 89.1 hours of it. The facility stated that the generator is test ran every Monday. The facility also appears to be conducting the appropriate maintenance of the unit. The unit was last serviced in April 2022. The unit appears to be permit exempt per Rule 285(2)(g).

#### **Space Heaters:**

The facility does have 2 hanging heaters that are fueled by natural gas only. Each unit is 0.4 MMBTU/hr and appear be exempt from permitting requirements per Rule 282(2)(b)(i).

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in compliance with the state regulations regarding permit exempt equipment. Staff stated to Mrs. Sunnerville that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 1:45 PM.-CJY

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