

B8735

MWWUP

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

B873573195

FACILITY: AMERICAN JETWAY CORP		SRN / ID: B8735
LOCATION: 34136 MYRTLE ST, WAYNE		DISTRICT: Detroit
CITY: WAYNE		COUNTY: WAYNE
CONTACT: Steven Fuller , Plant Manager		ACTIVITY DATE: 08/14/2024
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : August 14, 2024

TIME OF INSPECTION : 11:00 am

INSPECTED BY : Jill Zimmerman

PERSONNEL PRESENT : Steven Fuller, Plant Manager American Jetway
Dennis Trerreaurt, American Jetway
Richard Chappo, American Jetway

FACILITY PHONE NUMBER : 734-721-5930

FACILITY EMAIL ADDRESS : sfuller@americanjetway.com

FACILITY BACKGROUND

American Jetway is an industrial facility who fills aerosol cans for many different customers, including paint products, cleaning products and automotive products. The facility operates one shift per day, five days per week. The facility's filling lines are located in three adjacent buildings along Myrtle Street.

REQUIRED PPE

During the onsite inspection, I wore safety shoes, a safety vest, and eye protection.

COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility. No violations have been issued in the past regarding this facility. During past inspection, it was undetermined whether the mixing room required a permit or met an exemption.

PROCESS EQUIPMENT AND CONTROLS

The facility operates six different filling lines in three different buildings, as well as a chemical mixing room in one building and three small boilers used to heat water for a water bath. The boilers are natural gas fired. The three lines in the third building only fill nonflammable

chemicals, such as carpet cleaning materials. The mixing room is located in the second building. Chemicals used to fill the cans are either supplied by the customer or mixed at the facility. The facility fills approximately 2000 different chemicals. Many different propellants are used, such as carbon dioxide, nitrogen, propane, butane, dimethyl ether and difluoroethylene to name a few.

The bottles are placed on the conveyor line to be filled. First the chemical product is added to the bottle. The bottles then pass through the gassing area, where the propellant is added. The next part of the process includes adding labels, spray nozzles and caps to the bottles. The bottles are then packaged and returned to the customer.

INSPECTION NARRATIVE

I arrived at the facility and met with Mr. Steven Fuller and other representative from American Jetway. Initially we met together to discuss the process and the past permitting questions. Currently the mixing room is not permitted. EGLE met with the facility in January 2020 to discuss this issue. The facility explained that due to the large variety of chemicals used in the mixing room, determining whether this area was exempt by Rule 290 was very challenging. The company decided that it would be best to obtain a permit for the mixing room. Due to the COVID-19 pandemic which resulted in work shutdowns, the facility explained that the permit application would be delayed. As of the inspection, no permit application has been received. During this meeting, the facility stated that they planned to submit a permit application. Mr. Fuller stated that the facility planned to install an RTO unit to treat the emissions from the entire plant including the mix room. The facility is working with the consultant firm NTH, specifically with Mr. Eric Marko. I was shown a letter from NTH dated July 2022 stating that the facility planned to apply for a permit to install for the installation of an RTO for the mix room. As of this inspection, no permit applications have been received regarding this facility.

Together, we walked through the facility with Mr. Fuller explaining the process. We observed one filling line that was operating and another that was changing to a different product. Nothing was being actively mixed in the mixing room.

APPLICABLE RULES/PERMIT CONDITIONS

The facility currently does not operate under any air quality permits. Based on past inspections, the facility operates under Rule 290 exemption for the fill lines. During the onsite inspection, I was directed to contact Eric Marko with NTH Consultants regarding the required records to demonstrate compliance with Rule 290 for the filling lines.

Regarding the mixing room, I was shown a letter from July 2022 from NTH explaining that a permit would be required for the mixing room including the installation of an RTO to control the emissions. Mr. Fuller stated that the facility was in the process of purchasing the RTO. I

explained that the permit would need to be issued before the RTO could be installed. I was directed to contact Mr. Marko regarding the status of the permit application. To date no permit application or proof of an exemption has been received regarding the mixing room and a Violation Notice will be issued to address the emissions from the mixing room.

On Tuesday August 20, 2024, I sent the attached email to Mr. Marko requesting this additional information to clarify the facility's status regarding the exempts and permit process. On August 23, 2024, I received a response from Mr. Marko regarding the requested information, stating that he was working on gathering the information. On September 5, 2024, I sent a follow-up email with a deadline of September 12, 2024, for the requested information. On September 12, 2024 I received an email response with the monthly VOC emissions from the filling lines. The monthly emissions for each line never exceeded 65 pounds of VOC per month, which meets the criteria for exemption by Rule 290, since it was less than 1,000 pounds of VOC emitted monthly. These records are attached to this report.

The boilers are exempt from permitting by Rule 282(2)(b)(i) based on their size and fuel source of natural gas.

There are storage tanks located in the rear of the facility. One is 12,000 gallons, one is 8,000 gallons, and one is 1,000 gallons. These tanks are exempt from permitting by Rule 284 (i) as the tanks store different organic chemicals.

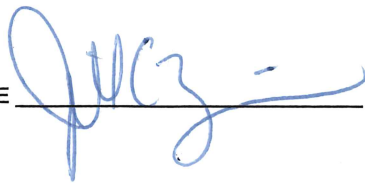
MAERS REPORT REVIEW

This facility is not required to submit MAERS for review.

FINAL COMPLIANCE DETERMINATION

The fill lines for this facility appear to be operating in compliance with Rule 290. The boilers appear to be operating in compliance with Rule 282(2)(b)(i). No permit application has been received to address the mixing room. At this time, the facility appears to be operating out of compliance based on the emissions from the mixing room.

NAME



DATE

9/19/24

SUPERVISOR

