

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

Facility : NBHX Trim USA Corporation		SRN : N2614
Location : 1020 Seven Mile Road		District : Grand Rapids
		County : KENT
City : COMSTOCK PARK	State: MI Zip Code : 49321	Compliance Status : Compliance
Source Class : MAJOR	Staff : Adam Shaffer	
FCE Begin Date : 9/27/2018	FCE Completion Date :	9/27/2019
Comments : 2019 FCE		

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
09/27/2019	ROP Semi 1 Cert	Compliance	As required by MI-ROP-N2614-2017, a Semi-Annual Compliance Report, postmarked 09/13/2019, was submitted to the AQD. The reporting time period was from 01/01/2019 through 06/30/2019. During this time period no deviations were reported. The report was received on time and properly certified. (AShaffer 09/27/19)
09/27/2019	CAM Excursions/Exceedances	Compliance	As required by MI-ROP-N2614-2017, a CAM Excursion/Exceedance Report, postmarked 09/13/2019, was submitted to the AQD. The report certification page and summary report form had a reporting time period of 01/01/2019 through 06/30/2019. A minor error was noted but deemed acceptable. During this time period no excursions/exceedances were reported. The report was received on time and properly certified. No further action is necessary at this time. (AShaffer 09/27/19)

Activity Date	Activity Type	Compliance Status	Comments
09/27/2019	CAM monitor downtime	Compliance	As required by MI-ROP-N2614-2017, a CAM Monitoring Downtime Report, postmarked 09/13/2019, was submitted to the AQD. The report certification page and summary report form had a reporting time period of 01/01/2019 through 06/30/2019. A minor error was noted but deemed acceptable. During this time period no monitoring downtime events were reported. The report was received on time and properly certified. No further action is necessary at this time. (AShaffer 09/27/19)
09/27/2019	MACT (Part 63)	Compliance	As required by MI-ROP-N2614-2017 and per the NESHAP Subpart DDDDD, annual tune up reports for the year 2018 and/or 2019 were submitted for EUBOILER-A and EUBOILER-C. After further review, the reports appear to be acceptable. The Report Certification page was filled out and properly certified. After further review, no further action is necessary. (AShaffer 09/27/19)
08/22/2019	Scheduled Inspection	Compliance	Scheduled unannounced inspection.
03/28/2019	MAERS	Compliance	The 2018 MAERS Certification form was received on 03/18/2019 (postmarked on 03/14/2019). The certification form was complete and properly signed. The electronic 2018 MAERS Report was received on 03/05/2019. The 2018 MAERS Report will be reviewed to determine if it is acceptable. (AShaffer, 03/28/19) Update - No significant errors were noted. The 2018 MAERS Report was concluded to be acceptable. (AShaffer, 04/18/19)

Activity Date	Activity Type	Compliance Status	Comments
03/28/2019	ROP Annual Cert	Compliance	<p>As required by MI-ROP-N2614-2017, an Annual Compliance Report, postmarked 03/14/2019, was submitted to the AQD. The reporting time period was from 01/01/2018 through 12/31/2018. During this time period two deviations were reported. The first deviation was regarding EUPUR2 Special Condition II.2, and is described as a mold release limit of 0.4 lbs VOC/gal (minus water) as applied that was exceeded. Further review, this limit was concluded to be a mistake. PTI No. 73-14A was approved on 08/10/18 amending the VOC content (minus water) of the mold release used in EUPUR2. The duration of the deviation was stated to be 8 months. The second deviation was the late submittal of the first semiannual report for 2018. It was stated by the company to have been an oversight and future reports will be submitted in a timely manner. The report was received on time and properly certified. After further review, no further action is necessary. (AShaffer 03/28/19)</p>

Activity Date	Activity Type	Compliance Status	Comments
03/28/2019	ROP SEMI 2 CERT	Compliance	<p>As required by MI-ROP-N2614-2017, a Semi-Annual Compliance Report, postmarked 03/14/2019, was submitted to the AQD. The reporting time period was from 07/01/2018 through 12/31/2018. During this time period two deviations were reported. The first deviation was regarding EUPUR2 Special Condition II.2, and is described as a mold release limit of 0.4 lbs VOC/gal (minus water) as applied that was exceeded. Further review, this limit was concluded to be a mistake. PTI No. 73-14A was approved on 08/10/18 amending the VOC content (minus water) of the mold release used in EUPUR2. The duration of this deviation was stated to be 8 months and was reported in the first semiannual compliance report of 2018. The second deviation was the late submittal of the first semiannual compliance report for 2018. It was stated by the company to have been an oversight and future reports will be submitted in a timely manner. The report was received on time and properly certified. After further review, no further action is necessary. (AShaffer 03/28/19)</p>
03/28/2019	CAM Excursions/Exceedances	Compliance	<p>As required by MI-ROP-N2614-2017, a CAM Excursion/Exceedance Report, postmarked 03/14/2019, was submitted to the AQD. The report certification page and summary report form had a reporting time period of 01/01/2018 through 12/31/2018. The correct time periods should have been 07/01/2018 through 12/31/2018. During this time period no excursions/exceedances were reported. The report was received on time and properly certified. No further action is necessary at this time. (AShaffer 03/28/19)</p>

Activity Date	Activity Type	Compliance Status	Comments
03/28/2019	CAM monitor downtime	Compliance	As required by MI-ROP-N2614-2017, a CAM Monitoring Downtime Report, postmarked 03/14/2019, was submitted to the AQD. The report certification page and summary report form had a reporting time period of 01/01/2018 through 12/31/2018. The correct time periods should have been 07/01/2018 through 12/31/2018. During this time period no monitoring downtime events were reported. The report was received on time and properly certified. No further action is necessary at this time. (AShaffer 03/28/19)
10/10/2018	ROP Semi 1 Cert	Compliance	As required by MI-ROP-N2614-2017, a Semi-Annual Compliance Report was submitted to the AQD. The reporting time period was from 01/01/2018 through 06/30/2018. During this time period one deviation was reported. The deviation was from EUPUR2 Special Condition II.2, and is described as a mold release limit of 0.4 lbs VOC/gal (minus water) as applied that was exceeded. Further review, this limit was concluded to be a mistake. PTI No. 73-14A was approved on 08/10/18 amending the VOC content (minus water) of the mold release used in PUR2. An error was noted in the time period of the dates of occurrence. This was discussed with the company. A corrected form was not resubmitted. The report was received late. After further review, no further action is necessary. (AShaffer 10/10/18)

Activity Date	Activity Type	Compliance Status	Comments
10/10/2018	CAM Excursions/Exceedances	Compliance	As required by MI-ROP-N2614-2017, a CAM Excursion/Exceedance Report was submitted to the AQD. The report certification page stated the reporting time period from 01/01/2017 through 06/30/2017 and the summary report form had a reporting time period from 01/01/2018 through 12/31/2018. Both of these time periods were incorrect, and should have been 01/01/2018 through 06/30/2018. The errors were discussed with the company. Corrected forms were not resubmitted. During this time period no excursions/exceedances were reported; however, the report was received late. After further review, no further action is necessary at this time. (AShaffer 10/10/18)
10/10/2018	CAM monitor downtime	Compliance	As required by MI-ROP-N2614-2017, a CAM Monitoring Downtime Report was submitted to the AQD. The report certification page stated the reporting time period from 01/01/2017 through 06/30/2017, though the summary report stated a correct time period from 01/01/2018 through 06/30/2018. This error was discussed with the company. A corrected form was not resubmitted. During this time period no monitoring downtime events were reported; however, the report was received late. After further review, no further action is necessary. (AShaffer, 10/10/2018)

Name: Adam J. Shaffer

Date: 09/27/19

Supervisor: [Signature]