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

P037471798

FACILITY: Plasan North America		**SRN / ID:** P0374
LOCATION: 3195 WILSON DRIVE, WALKER		**DISTRICT:** Grand Rapids
CITY: WALKER		**COUNTY:** KENT
CONTACT: Lisa Thorsen , Director of Human Resources		**ACTIVITY DATE:** 04/30/2024
STAFF: Laura Martin	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: The purpose of this inspection was to determine compliance with PTI 15-23 and all other applicable air quality rules and regulations.		
RESOLVED COMPLAINTS:		

On Tuesday, April 30, 2024, AQD staff Laura Martin (LM) and Eric Grinstern (EG) conducted an unannounced, scheduled on-site inspection of Plasan North America located at 3195 Wilson Drive NW, Walker, Michigan. The purpose of this inspection was to determine compliance with Permit to Install (PTI) No. 15-23 and all other applicable air quality rules and regulations.

LM and EG arrived at the facility at approximately 10:00 am. Prior to entry, LM and EG observed the perimeter of the facility for any odors, fugitive emissions, or opacity. None were noted. They met with Ms. Molly Barnett, Compliance Manager, and Mr. Charles Davison, Consultant, who accompanied LM and EG on the tour of Plasan.

Facility Description

Plasan North America (PNA) absorbed Plasan Carbon Composites (PCC) in a merger and the company is now only known as Plasan North America (PNA). PCC was a manufacturer of high-end carbon composite automotive parts, primarily hood and roofs. The parts were manufactured by heat molding carbon composite into the desired shape and then finished via sanding, bonding, and coating. Since the merger, PNA has removed a majority of their production lines and shifted into metal work, primarily welding. They also have some equipment for laser-cutting, sand blasting and heat treating. PNA designs and manufactures products for military and industrial applications.

Previously, PNA was operating under an ROP which was voided in February 2023, following the issuance of Opt-out PTI No. 15-23, in which Hazardous Air Pollutants (HAP) emissions are limited to opt-out of the Title V. The merger and name change followed in November 2023.

Regulatory Analysis

EUCARBONMOLD

This emission unit did not operate in 2023 and was dismantled in July 2023 with no plans to operate again in the future. It previously consisted of 7 oil-heated molding presses, a natural gas fired boiler rated at 3.2 MMBTU/hr, and autoclaves, (one (1) natural gas-fired and two (2) electric).

Volatile Organic Compounds (VOC) emissions are limited to 2.9 tons per year (tpy), based on a 12-month rolling time period from this process. Per the attached records, no VOCs were emitted from this emission unit and as of December 2023 the 12-month rolling VOC emissions were 0.00 tpy. The VOC content of the mold release used in this process is limited to 6.4 lb./gal. Per the records, the highest VOC content mold release is 6.29 lb./gallon. PNA is properly tracking the gallons of each material used per month.

EUPULTRUSION

This emission unit has been operated very rarely over the past year, only operating in July and September 2023. VOC emissions from this process are limited to 4,000 lb./year based on a 12-month rolling time period, and as of December 2023, the 12-month rolling emissions were .00001 tpy. Acetone emissions are also limited from this process. Emissions are limited to 790 lb./year based on a 12-month rolling time period. As of December 2023, acetone emissions were 229.25 lb./year based on a 12-month rolling time period. Plasan is adequately tracking the materials that are used, and all recordkeeping appears adequate.

Stack parameters, while not explicitly measured, appeared to be correct and have not been modified since the previous inspection.

Other operations include welding stations, sand blasting stations, and cutting stations. The welding stations are exempt from Rule 201 permitting under Rule 285(2)(i). The sand blasting and cutting stations are exempt from Rule 201 permitting under Rule 285(2)(l)(vi)(B).

All waste materials throughout all of the buildings appeared to be covered, and disposed of in an appropriate manner, thus minimizing fugitive emissions.

FGFACILITY

The source-wide conditions apply to all process equipment source-wide including equipment covered by other permits, grandfathered equipment, and exempt equipment, and is applicable to both sections, combined.

Individual HAP emissions are limited to 9.9 tpy and aggregate HAP emissions are limited to 24.9 tpy, both based on a 12-month rolling time period. Per the attached records, as of April 2024, aggregate HAP emissions were 0.000041 tpy, with MIBK and Formaldehyde being the highest individual HAPs emitted at 0.00002 tpy each. Records also indicated that PNA is properly tracking the usage of each HAP containing material, including reclaim, and HAP content of each material.

Facility wide styrene emissions are limited to 2 tpy based on a 12-month rolling time period. Due to the changes in production at the facility, the use of styrene has decreased dramatically. Throughout the course of 2023, styrene emissions were .0000003 tpy. While onsite, it was noted that the amount of the chemical available for use was only two small containers, approximately 1-2 gallons in size.

SLIES data was reviewed for reporting year 2023, and emissions were deemed acceptable and aligned with records from the inspection.

Compliance Determination

Based on the observations made during the inspection and a subsequent review of the records, it appears that Plasan North America is in compliance with PTI No. 15-23.

NAME Laura Martin DATE 5/20/2024 SUPERVISOR