B5826
MW1LL

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

B582630306

FACILITY: J BAUTOTECH LLC		**SRN / ID:** B5826
LOCATION: 34039 SCHOOLCRAFT RD, LIVONIA		**DISTRICT:** Detroit
CITY: LIVONIA		**COUNTY:** WAYNE
CONTACT:		**ACTIVITY DATE:** 07/17/2015
STAFF: Stephen Weis	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** Minor
SUBJECT: Compliance inspection of JB Autotech, LLC. The JB Autotech facility is scheduled for inspection in FY 2015.		
RESOLVED COMPLAINTS:		

Location:
JB Autotech, LLC (SRN B5826)
34039 Schoolcraft Road
Livonia

Date of Activity:
Friday, July 17, 2015

Personnel Present:

Steve Weis, DEQ-AQD Detroit Office
Rick Berry, Plant Manager, JB Autotech

Purpose of Activity

A self-initiated inspection of the JB Autotech, LLC facility (hereinafter "JB Autotech") was conducted on Friday, July 17, 2015. The JB Autotech facility was on my list of sources targeted for an inspection during FY 2015. The purpose of this inspection was to determine compliance of operations at the JB Autotech facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), and Federal standards. The facility also an active DEQ-AQD, permit, Permit to Install No. 7-09.

Facility Description

The JB Autotech facility is located along the south side of Schoolcraft Road, just west of Stark Road. The east and westbound lanes of Schoolcraft Road are divided by Interstate 96, and Schoolcraft serves as the service drive for the freeway. The area on the south side of Schoolcraft consists of various commercial and light industrial type properties; this type of land use extends south to the railroad right-of-way west of Stark, and even further south on the east side of Stark. The area on the north side of Schoolcraft Road is primarily residential, with some office and retail properties mixed in near Stark and Farmington Roads. The closest residential property is located approximately 120 yards to the north of JB Autotech.

JB Autotech performs machine and product design/build services for clients. JB Autotech's website states:

"With 25 years of experience in the automotive and manufacturing industries, we offer complete product design and build services; precision gages, perishable tooling, checking fixtures, automation systems, mold & tool design, parts machining, equipment fabrication, and much more."

Facility Operations

The JB Autotech facility operates six days per week. The facility currently operates one shift that begins at 5:30am, and lasts for 8-10 hours. The facility employees 15 people in production, and some additional staff in engineering.

The facility consists of a two story office portion in the northeast corner of the building, with warehousing and the production activities taking up the remainder of the building. There is a parts storage area just behind the office section.

There are various tooling machines – lathes, carbon grinders – located throughout the northern portion of the production area. All of this equipment is vented in-plant. The carbon grinders are all fitted with vents that take particulate away from the part, and send it to a filter for capture. There is also an assembly area where products are put together for customers.

A new paint booth was installed in the southeast corner of the building. It has not yet begun full operation. The paint booth has a treated/conditioned air intake, and the oven is capable of a low temperature curing of coated parts. The booth is equipped with side exhaust and filters. Paint is applied using Devilbiss high volume-low pressure (HVLP) coating applicators.

Inspection Narrative

I arrived at the facility at 9:00am. I checked in at the reception window, and met the Plant Manager, Rick Berry. Rick and I sat down, and I began the site visit by providing him with the purpose of my visit. We discussed the facility, and Rick provided me with a description of the operations at JB Autotech. Then we walked around the facility.

We walked past the parts storage area and into the production area of the building. I asked Rick how the building is heated. He told me that hanging, radiant natural gas heaters are used in the production area, and that there is a rooftop HVAC unit that provides climate control to the building. I observed some of the hanging heaters during the facility walk-through.

We walked through the production area, and Rick pointed out the operation of some of the lathes and carbon grinders. Rick described the air filters associated with the carbon grinders.

We then walked to an area where some products were being assembled. Rick showed me a product that JB Autotech is building for a customer. The customer builds mufflers, and the machine that JB Autotech is building allows the customer to check the mufflers for leaks.

We then proceeded to the back of the facility, and we discussed the paint booth. Rick told me that the City of Livonia's Fire Department and Gallager Fire Equipment Company have inspected the paint booth and approved it for safety and fire suppression. We were able to walk inside and look at the exhaust configuration as the booth was not in use. The booth has not been used much since it was installed, so it was very clean inside, with no visible overspray or accumulated paint solids. I described DEQ-AQD's permitting requirements for paint booths to Rick, including the exemption provisions of Michigan Administrative Rule 287. Rick told me that the booth was planned for small jobs and low paint use, and he thought that the facility would use much less than the 200 gallon per month maximum usage limit to qualify for the Rule 287 exemption. I told Rick that the facility would need to keep records of all paint usage in order to continuously demonstrate compliance with the exemption, and I advised him that DEQ-AQD should be notified if the paint usage increases to 200 gallons per month or greater. I told Rick that I would send him a paint usage recordkeeping sheet that DEQ had creating to help in tracking compliance with the Rule 287 exemption provisions. A copy of the e-mail that I sent to Rick on July 20th is attached for reference. I asked Rick about the types of coatings that will be used in the paint booth. He told me that the current plan is to use one particular primer and coating. Rick provided me with Material Safety Data Sheets (MSDS) for the coating and primer, copies of which are attached to this report for reference.

I left the facility at 9:40am.

Permits/Orders/Regulations

JB Autotech was issued a DEQ-AQD Permit to Install. No. 7-09, on June 18, 2010. This permit addresses the installation and operation of eight engine test cells at the facility that were to be used to test engines capable of firing gasoline, ethanol, diesel, and biodiesel. This permit served as an opt-out permit, limiting the emissions from the test cells to below major source thresholds for criteria pollutants and HAPs. Rick told me that engine

test cell project never came to fruition, so no testing machines were ever purchased. I let Rick know that the Permit to Install will be voided.

The tooling and assembly equipment and operations at the facility are exempt from the DEQ-AQD requirement to obtain a Permit to Install per the provisions of Michigan Administrative Rule 285(l)(vi), which exempts processes such as grinders and lathes from permitting requirements as long as the equipment is used on a non-production basis, is vented in plant, or uses filters to clean any externally vented emissions. Any welding operations that might occur as part of the assembly operation are exempt per the provisions of Rule 285(i).

It should be noted that, as with other facilities that are involved in metal fabrication, the processes and operations at JB Autotech may be subject to the Federal requirements of the Metal Fabrication and Finishing Area Source NESHAP (National Emission Standards for Hazardous Air Pollutants), promulgated as 40 CFR Part 63, Subpart XXXXXX. These standards apply to non-major sources of HAPs at which the primary activity of the facility is one of nine identified source categories. While JB Autotech does potentially perform some fabrication of metal products, it does not appear to be the primary activity at the facility. It should be noted that DEQ-AQD does not have delegated authority for this regulation.

The paint booth is exempt from DEQ-AQD permitting requirements per the provisions of Rule 287(c), as long as the company keeps the coating usage below 200 gallons per month, keeps records of coating usage to demonstrate compliance with the 200 gallon per month limit, and maintains and operates the particulate filter when the paint booth is operating.

Compliance Determination

Based upon the results of the July 17, 2015 site visit and subsequent regulatory review, the JB Autotech facility appears to be in compliance with applicable State and Federal regulations

Attachments to this report: a copy of the MSDS sheets for the coating and primer that is to be used in the paint booth; a copy of the e-mail the provides the Rule 287 recordkeeping information.

NAME Steve Wei DATE 10/1/15 SUPERVISOR JK