

M4825
MHWILT

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

M482541601

FACILITY: DEARBORN MID-WEST COMPANY		SRN / ID: M4825
LOCATION: 20336 SUPERIOR RD, TAYLOR		DISTRICT: Detroit
CITY: TAYLOR		COUNTY: WAYNE
CONTACT: Mark Duxter, Manager of HSE		ACTIVITY DATE: 11/18/2016
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Target Inspection		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : 11/18/2016
 TIME OF INSPECTION : 11:00 am
 NAICS CODE : 333922
 EPA POLLUTANT CLASS : VOC
 INSPECTED BY : Jill Zimmerman, AQD
 PERSONNEL PRESENT : Mark Duxter, Director of Operations, Quality & Safety
 markd@dmwcc.com
 Al Chaffin, Manufacturing Manager
 alc@dmwcc.com
 FACILITY PHONE NUMBER : 734-288-4400
 FACILITY FAX NUMBER : 734-288-1916

FACILITY BACKGROUND

Dearborn Midwest Conveyor (DMW) manufactures conveyors for the auto industry. The majority of the facility is a machine shop, welding area or storage with one paint spray booth. DMW is located in Taylor on Superior Road and is bordered by Northline Road to the north, Allen Road to the east, Eureka Road to the south and Pardee Road to the west. The facility is considered a synthetic minor source for hazardous air pollution (HAPs) emissions, and operates with an opt-out permit. The facility operates one shift per day, five days per week.

COMPLAINT/COMPLIANCE HISTORY

No complainants have been received regarding this facility. No Violation Notices (VN) have been issued regarding this facility.

PROCESS EQUIPMENT AND CONTROLS

The facility operates a welding and machine shop area, with individual welding areas. Each welding area vents directly into a hood, with the exhaust from each station collected and combined before it passes into the baghouse. The welding equipment and baghouse are exempt under R336.1285 (i).

A paint booth, permitted under Permit 21-00, operates in the workshop area on an as needed basis. The paint gun lines are purged with air unless there is a color change, when they are purged with acetone. The filters are changed on an as needed, usually once per day. Used filters are stored on site sealed until they are landfilled off site. All paints were stored in closed five gallon containers during the inspection. All paints are water based paint; the facility no longer uses solvent based paints. Waste paint is stored in labeled, closed 55 gallon drums. When the drums are full, the facility has them shipped off site through a disposal company. There is no cure oven associated with the paint line; all parts dry in the ambient air.

Typically, the customer orders are custom made based on the customers specification. The conveyor systems are made at this facility. If the lines need to be heat treated, the metal pieces are sent off site. The pieces are painted and allowed to air dry. There is no cure oven at this location for any painted projects.

INSPECTION NARRATIVE

I arrived at the facility at 10:45 am on 11/18/2016 and met with Mr. Mark Duxter to discuss the process, and any changes that have been made to the facility. No changes to the process have been made to the facility since my last visit. I also met with Mr. Al Chaffin, to perform the onsite plant inspection.

We toured the plant floor, and physically inspected the equipment. No painting was occurring during the inspection, though some parts had recently been painted. Filters were present inside the booth on the walls and the floor. Because the wall filters are on rolls, extra filters can be rolled at any time. The booth vents directly to three stacks located on the north side of the building. These stacks have not been modified since they were installed. The facility's waste consists of used oil, empty paint buckets, used paint filters and other miscellaneous waste. Outside the facility, a shelter is used to store dumpsters, which each store a separate type of waste.

Monthly, the facility performs an inventory of all the paint at the facility. This information is used to determine the paint usage for the previous month. The manufactures data along with the paint usage records are recorded into the spreadsheet to calculate the VOC and HAP emissions.

APPLICABLE RULES/PERMIT CONDITIONS

The welding operations are exempt under Rule 285 (i).

The paint booth is permitted under permit 21-00, and the special conditions are as follows:

1. NA – No notification is required to operate this facility.
2. COMPLIANCE – Records from 2015 show the VOC emissions in tons per year on a 12 month rolling average to be between 3.6 TPY and 1.8 TPY during the past 12 months, which is below the 15 TPY limit; and also show a pph limit on a monthly average of between 0.7 and 3.5 which is below the 11.0 pph limit in a calendar month.
3. COMPLIANCE – Facility does not use any paints with VOC content greater than 3.5 pounds per gallon (minus water). The VOC content for all the coatings are in the range of 2.42 pounds VOC per gallon to 3.49 pounds VOC per gallon, which is less than the permitted limit. All MSDS for all coatings are kept in a binder at the facility. The facility has recently completely switched from solvent based coatings to water based coatings, which should have a lower VOC content.
4. COMPLIANCE – HAPs emissions in TPY based on a 12 month rolling average were in a range of 0.9 TPY and 0.4 TPY during 2015 for total HAPs, which is less than the permit limit of 22.0 tons total HAPs, and 9.0 tons individual HAPs.
5. COMPLIANCE – Proper records are kept at the facility and were reviewed during the onsite inspection.
6. COMPLIANCE – Filters were present during the inspections and appeared to be in good working condition. Replacement filters were also present at the facility.
7. COMPLIANCE – Waste containers were stored in a separate area, and were in closed containers.
8. COMPLIANCE – MSDS for each coating were present at the facility.

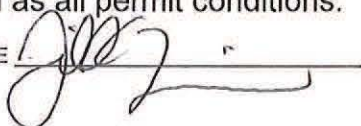
- 9. COMPLIANCE – All stacks meet height and diameter requirements, and have not been changed or modified since installation.

MAERS REPORT REVIEW

This report was received on March 11, 2016 for the reporting year of 2015. The emissions have decreased while the total paint throughput has increased. The company provided supporting documentation which included monthly throughput records, VOC emissions records, and HAPs emissions. This document supports the reported emissions. This report was reviewed on March 29, 2016.

FINAL COMPLIANCE DETERMINATION

Dearborn Midwest Conveyor is operating in compliance of all state and federal regulations as well as all permit conditions.

NAME 

DATE 9/26/17

SUPERVISOR JK