

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

N091763804

FACILITY: SPRAYTEK INC		SRN / ID: N0917
LOCATION: 2535 WOLCOTT, FERNDALE		DISTRICT: Warren
CITY: FERNDALE		COUNTY: OAKLAND
CONTACT: Susan Apczynski , Quality Assurance Manager		ACTIVITY DATE: 07/22/2022
STAFF: Robert Elmouchi	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

On Friday, July 22, 2022, I conducted a scheduled inspection of SprayTek, Inc, located at 2535 Wolcott, Ferndale, Michigan. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and Permit to Install (PTI) No. 143-04D.

PTI 143-04D was approved on March 14, 2022. This permit rolled in spray booths that were installed and operated per the R 336.1287(2)(c) exemption from R 336.1201. It is important to note that even while operating as exempt spray booths under Rule 287(2)(c), SprayTek did record and calculate the VOC and HAP emissions from each booth and included these emissions in the PTI 143-04C emission calculations.

I entered SprayTek and met with Ms. Susan Apczynski, Quality Assurance Manager, Mr. Kip Harrison, Operations Manager, and Mr. Marvin Hairston, Manager. Ms. Apczynski and Mr. Harrison escorted me throughout the inspection and provided records. I began the inspection with an opening meeting with Ms. Apczynski. We reviewed the permit-required recordkeeping and then conducted the facility inspection.

RECORDKEEPING

VOC emission limits are specified in FGRULE621. The HAP emission limits are specified in FGFACILITY. I collected records for the date range of January 2021 through June 2022.

A review of the permit required recordkeeping indicates that SprayTek is in compliance with the permit specified monthly VOC emission limit of 2000 pounds per month, and 10.0 tons per year per each individual emission unit in FGRULE621. The records also indicated SprayTek is in compliance with the 12-month rolling VOC emission limit of 30.0 tons per year,

A review of the permit-required recordkeeping appears to indicate that SprayTek is in compliance with the permit-specified individual HAP limit of 9.0 tpy and the aggregate HAP emission limit of 22.5 tpy.

In compliance with the training requirements of Appendix A - Fugitive VOC Emissions and Odor Control Plan, SprayTek provided records that document comprehensive VOC emission and odor control training procedures. The permittee also provided a training schedule and records of employee training.

FACILITY INSPECTION

Susan Apczynski and Kip Harrison escorted me throughout the facility inspection.

EUBATCH2 is a cross-draft spray booth. I observed the EUBATCH2 air-cleaning control device, which consists of dry filters. The dry filters control particulate matter (PM) emissions. The EUBATCH2 dry filters were not properly installed as required per PTI No. 143-04D, FGRULE621, IV.1, because the installation method created gaps that allow a portion of the exhaust to bypass the control device (see attached photos). Susan Apczynski, Kip Harrison, and I discussed how to resolve this noncompliance. SprayTek's failure to install the control device in a satisfactory manner and in accordance with air pollution control rules and existing law constitutes a violation of PTI No. 143-04D, FGRULE621, IV.1, and R 336.1910. These violations shall be cited in a violation notice.

EUWASHLINE is a downdraft spray booth. I observed the EUWASHLINE Booth #1 and Booth #2 air-cleaning control devices, which consist of dry filters. The EUWASHLINE dry filters were not properly installed as required per PTI No. 143-04D, FGRULE621, IV.1, because the installation method caused the filters to buckle, which created gaps that allow a portion of the exhaust to bypass the control device. I explained to Susan and Kip that other companies address this issue by installing filters below the floor exhaust grates and then laying a second layer of filter media on top of the grates. This method not only reduces the potential for control device bypass it also reduces the frequency of replacing the filters installed below the floor grates. The permittee's failure to install the control device in a satisfactory manner and in accordance with air pollution control rules and existing law constitutes a violation of PTI No. 143-04D, FGRULE621, IV.1, and R 336.1910. These violations shall be cited in a violation notice.

PTI No. 143-04D, FGRULE621, III.3 states, "The permittee shall handle all VOC and/or HAP containing materials, including coatings, reducers, solvents, and thinners, in a manner to minimize the generation of fugitive emissions, implementing the procedures for minimizing emissions as described in Appendix A. The permittee shall keep containers covered at all times except when operator access is necessary." While inspecting the Paint Mixing Room, I observed that the permittee failed to handle a one-gallon can of acetone in a manner to minimize the generation of fugitive emissions because the can was left uncovered when the operator was absent. The permittee's failure to minimize fugitive emissions constitutes a violation of PTI No. 143-04D, FGRULE621, III.3. This violation shall be cited in a violation notice.

It is important to note that I have inspected this facility 18 times since 2008. SprayTek has made dramatic improvements in controlling fugitive emissions from the Paint Mixing Room. Through the application of best management practices and employee training, the permittee has implemented programs that effectively reduced fugitive emissions. For example, in

2008, the intensity of fugitive emissions motivated me to leave the room as quickly as possible. During this inspection, I barely detected a solvent odor. Furthermore, I contacted a neighboring complainant who verified the odor was not usually detected except during infrequent weather conditions. Regardless of the improvements, because this is a controversial foul odor source, I am citing the failure to cover a one-gallon can of acetone.

All other emission units appeared to be properly operated and maintained.

CONCLUSION

SprayTek is in violation of PTI No. 143-04D, FGRULE621, IV.1, R 336.1910, and FGRULE621, III.3, which shall be cited in a violation notice.



Image 1(EUBATCH2 Spray Booth) : Photo of EUBATCH2 dry filter particulate material control device. Gaps in filter placement resulted in gaps that allow particulate material to bypass the control device.

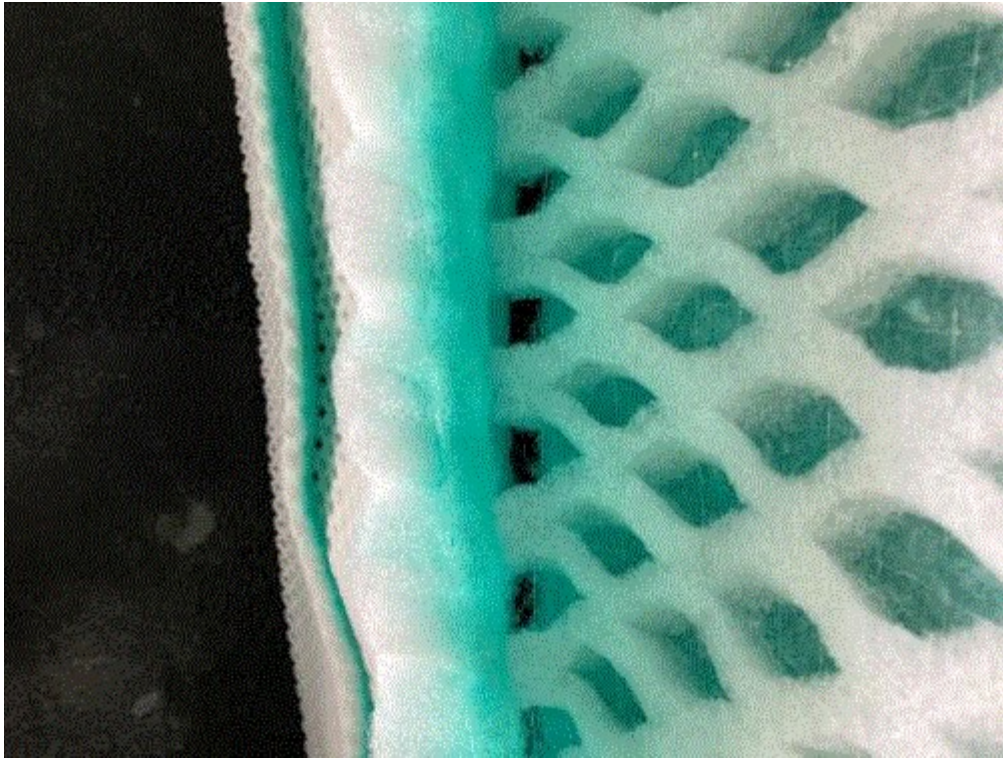


Image 2(EUBATCH2 close up) : Close up view of dry filter media used to control particulate material (PM) emissions. The overlapping of filter media provides a path (center) for PM to bypass the control device.

NAME Robert Elmarchi

DATE 8/16/2022

SUPERVISOR Joyce