

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

N097742395

FACILITY: Jackson Industrial Coating Services		SRN / ID: N0977
LOCATION: 3600 Scheele Drive, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT: WH Hopkins , Vice President		ACTIVITY DATE: 11/16/2017
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Unannounced compliance inspection of a powder coating facility.		
RESOLVED COMPLAINTS:		

Minor Source-**Facility Contacts**

W. J. Hopkins-Vice President

jjcs@voyager.net

ph 517-782-8972

Website: <https://www.jacksonpowdercoating.com>**Purpose**

On November 16, I conducted an unannounced compliance inspection of Jackson Industrial Coating Services (Company) located at 3600 Scheele Drive, Jackson, Michigan. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

Facility Location

The facility is located in Jackson in an industrial park. See attached aerial photo.

Facility Background

The last inspection was conducted on 9/27/2007 and no violations were found.

Regulatory Applicability

Powder coating line and associated ovens are PTI exempt per Rule 287 (2) (d).

4 million BTU/hour natural gas fired boiler exempt per Rule 282(2) (b)(i).

8 stage parts washer PTI exempt per Rule 285 (2)(r).

Arrival & Facility Contact

No visible emissions were observed upon my approach to the Company's facility. Minor gassy like smell was noted in the parking lot next to a dryer oven stack. I arrived at 9 am, proceeded to the facility office to request access for an inspection and met W.H Hopkins (WH), the Vice President.

Pre-Inspection Meeting

WH outlined that there are only 8 employees and the facility is open from 7 am to 3 pm, 5 days a week.

WH indicated that this facility is a powder coating operation. A metal part first goes through an 8-stage washer that consists of iron phosphate and detergent that does not exhaust. (The water is alkaline.) The water in the washer is heated by a new 4 mm btu/hour natural gas fired boiler. Next the conveyerized part goes through a dry off oven then to one of two powder spray booths. One of the booths is used for black coating, the other for various colors. The booths are controlled by a cyclone and dust collector. The paint is applied manually using an electrostatic paint gun. After the part has been coated, it goes through a curing oven.

The racks used to hold the parts are placed in a burn-off oven to remove the powder coat paint build-up. This occurs about 4 times a week. The burn-off oven was installed a couple of years ago to replace one that had been installed back in 1986.

Onsite Inspection

WH gave me a brief tour of the facility. He first showed me the burn off oven. (See attached photo.) It was not operating. The setpoints on the device showed that the oven is operated at 820 degrees F. and the afterburner was set for 1420 degrees F. There was no chart recorder. A check of the exhaust stack showed that it was at least twice as high as the building and had a rain cap. WH showed me a no-loss rain cap next the bake-off oven that had yet to be installed. WH indicated that when the bake oven is operated there is never any smoke. There is interlocked device of the oven/afterburner so they can only be operated at the same time. The BTU ratings of the oven/afterburner was not readily available.

Next, he showed me the parts washer line. WH indicated they were half way through a project to refurbish the line. Adjacent to the parts washer line, was a new 4 mm BTU/hour boiler. See photos.

WH showed me the 2 ovens, the 2 powder coat booths and the cyclone/dust collector that is used to collect the excess particulate from the powder coating. (See attached photos.) The line was operating. The temperature of the curing oven was noted to be 410 degrees F.

WH showed me the outside courtyard area on the North side of the facility. I noted a metal cage like structure that contained ash. WH indicated to me that they burn used pallets. (See attached photo.)

Records Review/PTI Permit Conditions.

NA.

Post-Inspection Meeting

I held a brief post-inspection meeting with WH. I indicted to him that the burn off oven required a PTI permit. (Rule 290 is not applicable as the Company was not maintaining required records/emission calculations.) I suggested that he might be eligible for a general permit and I gave him instructions on where to find the appropriate forms online. To be eligible, he would need to install the no loss stack on the burn-off oven and install a chart recorder so that records could be kept on the afterburner temperature when the oven was in operation. I also noted that the open burning of wooden pallets was prohibited.

I departed the facility at approximately 9:30 am.

Compliance Summary

The Company is out of compliance with the following:

Rule 310-Open Burning

Rule 201-No permit to install for the bake-off oven.

A Violation Notice (VN) will be sent to the Company.



Image 1(Aerial photo) : Aerial photo.

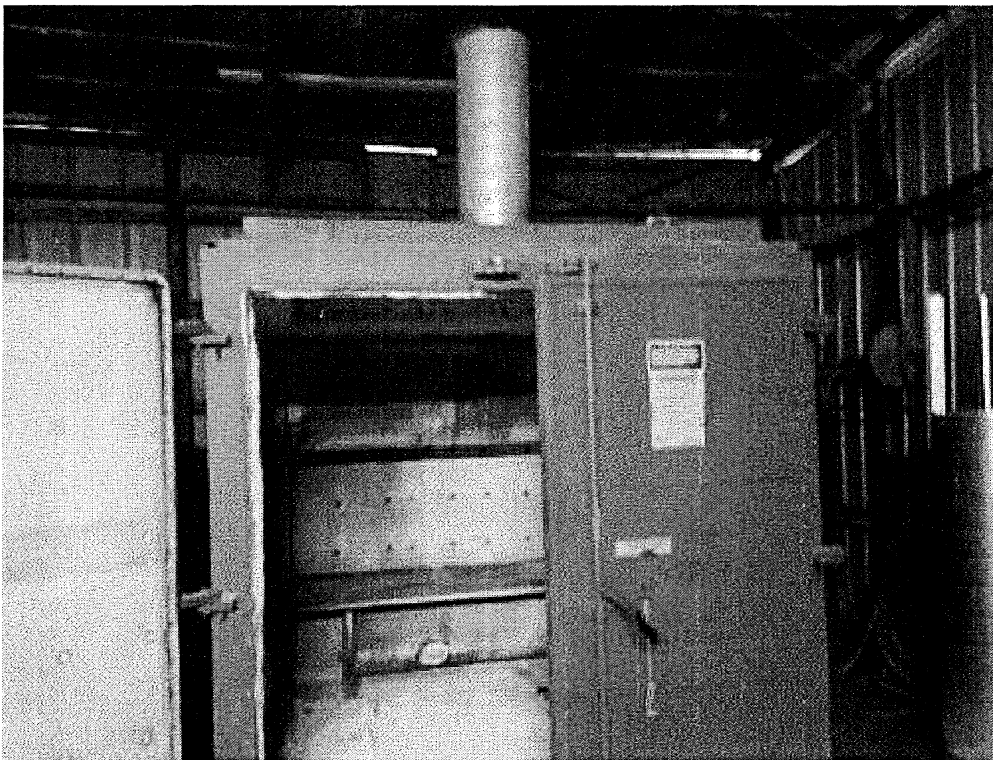


Image 2(Burn-off oven) : Burn-off oven.

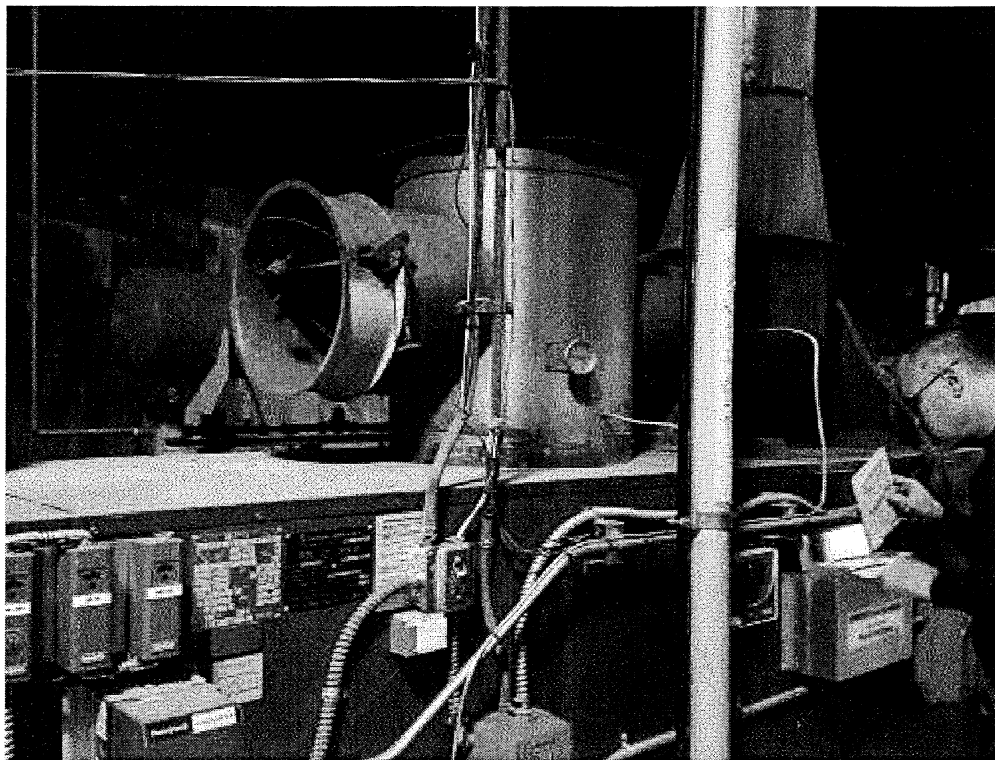


Image 3(New boiler) : New boiler.

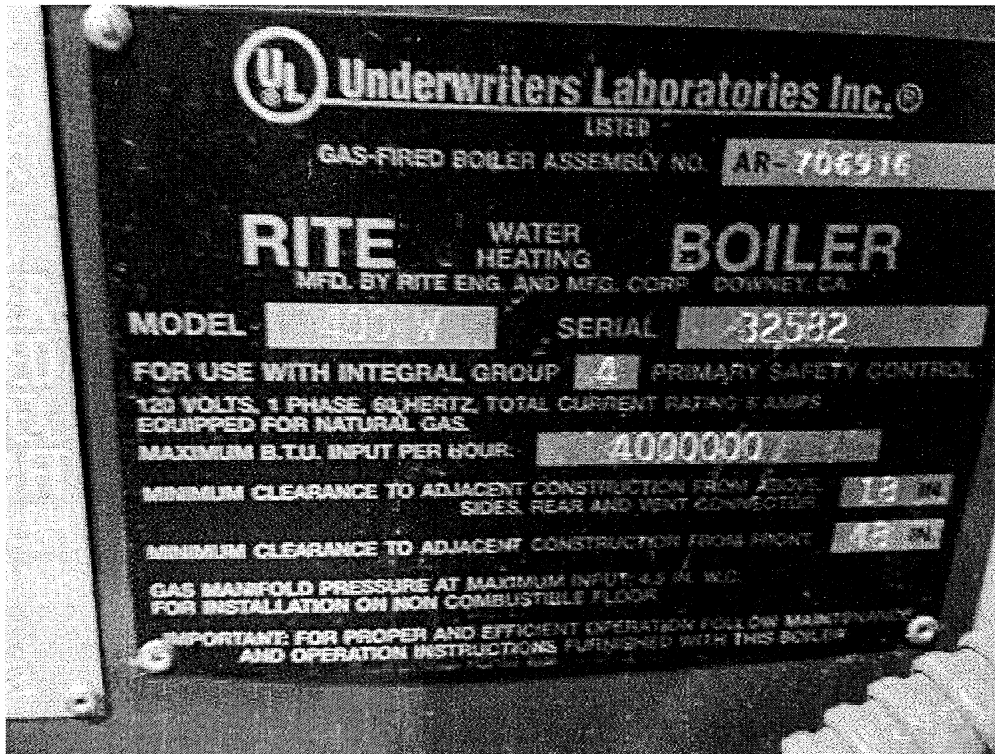


Image 4(Boiler specs) : Boiler specs.

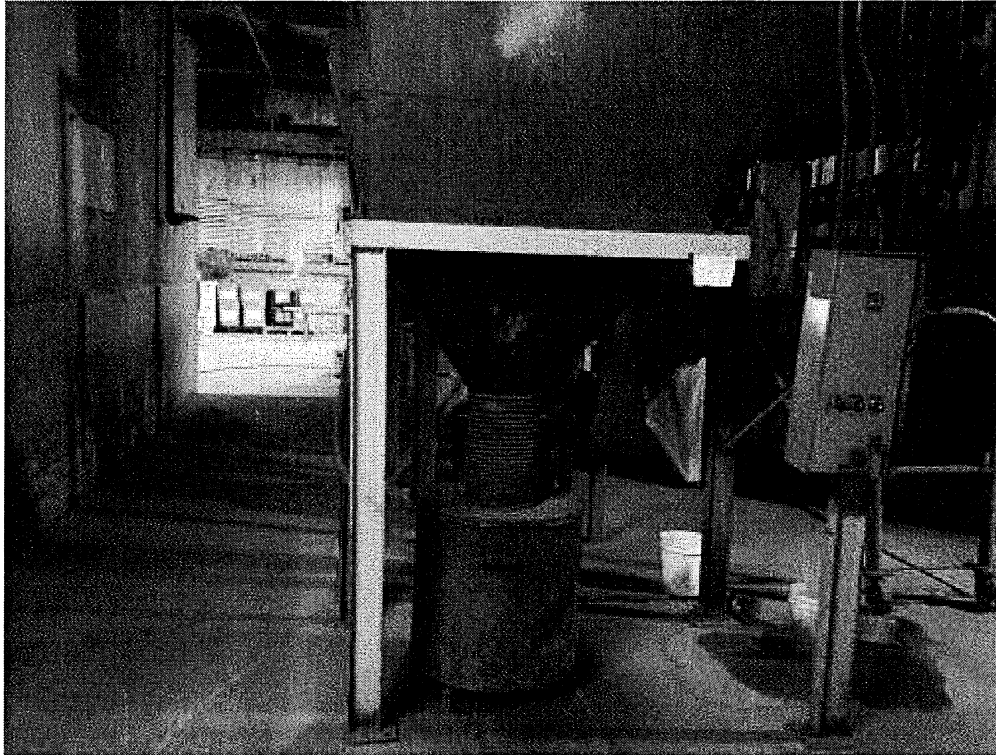


Image 5(Cyclone) : Cyclone for powder booths.

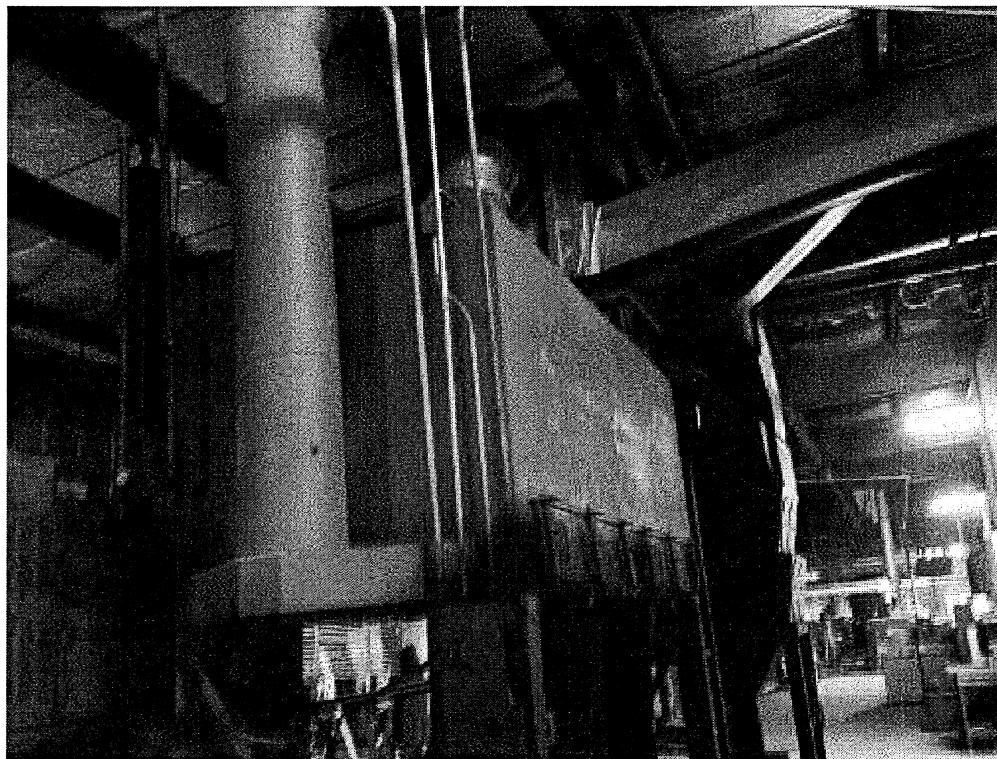


Image 6(Dust collector) : Dust collector for powder booths.

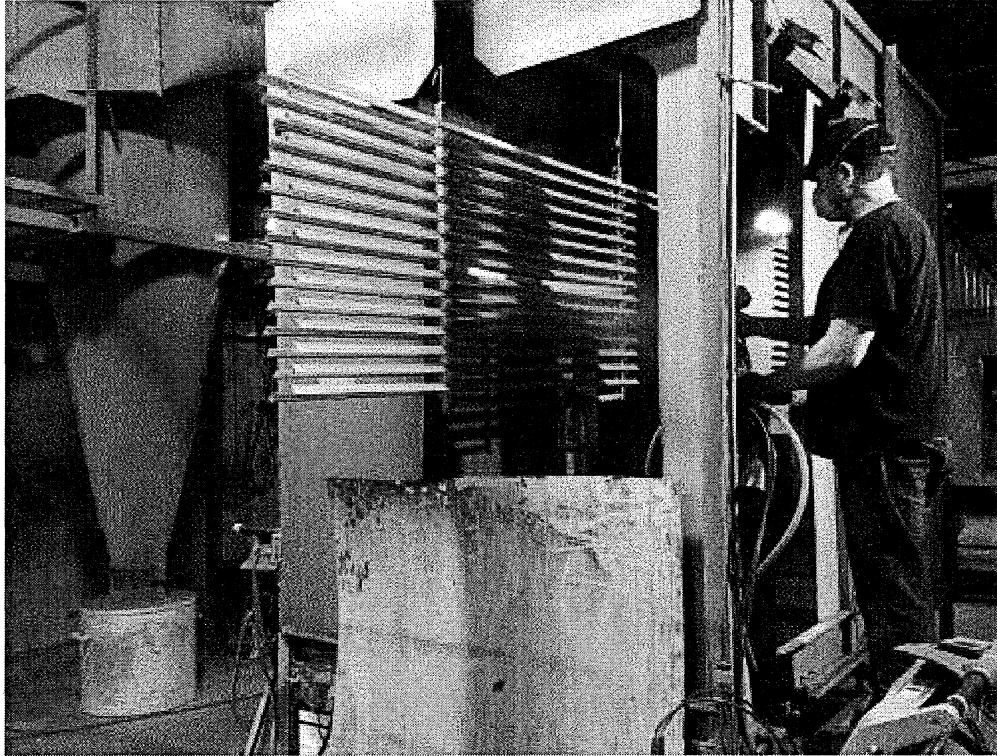


Image 7(Powder coat booths) : One of two powder coat booths.



Image 8(Metal cage) : Metal cage used to burn wooden pallets. In the background is the stack for the burn-off

oven.

NAME M. Kovalchuk

DATE 11/20/2017

SUPERVISOR 