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

N136224062

FACILITY: ISP Coatings		SRN / ID: N1362
LOCATION: 130 E Pond Dr, ROMEO		DISTRICT: Southeast Michigan
CITY: ROMEO		COUNTY: MACOMB
CONTACT: Cindy Surline , General Manager		ACTIVITY DATE: 11/22/2013
STAFF: Joyce Zhu	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Annual Inspection		
RESOLVED COMPLAINTS:		

On 11/22, I conducted an annual inspection at ISP Coating Corp., which is located on 130 E. Pond Drive, Romeo. I arrived at the facility at 9:30 AM. Donna Hills and Cindy Surline met with me. I stated the purpose of the inspection. Cindy took me to see the processes.

Inspection:
The operation hours are from 7:00 AM to 3:30 PM.

Metal parts are heated to about 450 to 475 F before going to the dip tank which contains plastisol or fluidized powder of either Nylon or Epoxy. Afterwards, the parts are cooled in water. Lastly, the parts are dipped into a tank containing rust prohibitor before being removed from the coating lines. Line #17, #10, & #11 are mostly for nylon powder coating. Line #12, #16 & #13 could be for epoxy, nylon, or plastisol coating. Line #18 is for either nylon or plastisol coating.

Permit # 114-04
This permit covers Machine # 12 to Machine #18. Machine #14 and #15 has been removed. As described above, these machines could use nylon, plastisol, and epoxy interchangeably. The dip tanks containing either nylon powder, epoxy powder, or plastisol are potable. When the tanks are not in use, they cover the tanks with cardboard. Metal parts are dipped in a primer tank, and then to an oven before going to the dip tank and final curing. After curing, the parts are quenched in a water tank before being removed from the line. They do not measure viscosity of the plastisol. Film thickness of the coating is achieved by adjusting the line speed. During the inspection, there were no visible emissions from the machines. They did not operate Line #18. All paints, solvents, as well as waste solvents, were stored in closed containers at the back of the plant in a separate room. I did not see any spills in the storage area. Since the company used the same plastisol as before, they did not conduct any method 24 VOC analyses after my last inspection. The company kept a record of the coating usage, the VOC content of each coating, and emission calculations of VOC, single HAP as well as HAPs. The company also calculates the VOC content in terms of lbs of VOC per gallon minus water on a daily basis. The record showed that the company operated in compliance with the permit limits for the months from October, 2012 to October, 2013. At the end of the inspection, I also took a sample of the plastisol. The sample has been sent to Trace Environmental Lab for Method 24 VOC analysis.

Cold Cleaners
There are two potable 5-gallon cold cleaners subject to MACT because they use TCE solvent in the cold cleaners. During the inspection, the cold cleaners were in the back of the building. All of the cold cleaners were closed with covers. There is an inch of

water layer on the surface of the solvent. The practice has met the requirements of 40 CFR 63 Subpart T. Each unit has equipped with a draining device. According to Cindy, they rarely use the units; the waste solvent from the units is sent to a licensed waste disposal facility.

Permit # 368-86
This permit covers a primer dip tank & oven. The process used to be in the back of the building (the same room as the material storage area: whereas the paint storage area was fenced). During the inspection, I found out that the company had removed the equipment. I advised the company to void the permit.

Permit #369-86,
The permit is for a nylon dip machine and an epoxy dip machine, Line #10 & #11 which can only coat nylon because the line only has flame oven. Unlike the newer lines which equipped with electric oven, these lines can't control temperature in the oven; as a result, only the nylon application (which is less sensitive to temperature) can be used in the lines. There was no visible emission from the lines during the inspection; it appeared that they operated in compliance with the permit requirements.

Permit #371-86,
This is for two plastisol coating machines & two ovens. According to the last inspection of 2011, the permit was for the screen printing process. They used to have two ovens for the screen printing process, but only one oven left. They don't use any TCE containing material in the process. The screening printing process can now be exempted according to Rule 285 (ix). Cindy said they seldom operated the process.

Other permit issues
There is additional nylon dip machine line installed. The process can be exempted from permit to install under Rule 287(d), except there was no particulate control for the dip coating process. Given that the process emits little particulate (unlike the spray coating operation), no control is acceptable for the operation.

In conclusion, the company operated in compliance with the Air Quality Regulations and their Air Use Permits requirements.

NAME Joyce Zhang DATE 1/10/2014 SUPERVISOR CJE