

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

N570648899

FACILITY: Elite Fence Products Inc.		SRN / ID: N5706
LOCATION: 50925 Richard W. Blvd., CHESTERFIELD		DISTRICT: Southeast Michigan
CITY: CHESTERFIELD		COUNTY: MACOMB
CONTACT: Paul Zaffarano, Director of Operations		ACTIVITY DATE: 04/04/2019
STAFF: Kaitlyn Leffert	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: FY2018 Scheduled Inspection. At the time of this visit, the permitted equipment (burn-off oven) was installed, but not yet operating.		
RESOLVED COMPLAINTS:		

On April 4, 2019, Michigan Department of Environmental Quality, Air Quality Division (EGLE-AQD) staff Adam Bognar and I conducted a scheduled inspection of Elite Fence Products at 50925 Richard W Blvd in Chesterfield, Michigan. Elite Fence Products pretreats and applies powder coatings to aluminum fences. Elite Fence has a General PTI (PTI No. 130-18) for one burn off oven to remove dried paint from the racks. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 44, Air Pollution control, of the Natural Resources and Environmental protection Act, 1994 PA 451, as amended (Act 451); the administrative rules; and the conditions of Permit to Install (PTI) No. 130-18.

#### Pre-Inspection Meeting

AQD staff arrived at Elite Fence Products and met with Paul Zaffarano, Director of Operations. Mr. Zaffarano explained that the permitted burn-off oven had been recently installed but was not yet operating. They expected to begin operating the burn-off oven very soon. I asked what is currently done to remove dried paint from the racks and he explained that the racks are shipped off-site to another location that processes the racks.

#### Records

Since the burn-off oven was not yet operating, there were not yet any records to go over. AQD staff spent time with Mr. Zaffarano going over the requirements of their general permit so that he was clear what needs to be done when the oven is operational.

#### Facility Tour

Following the meeting, Mr. Zaffarano showed us where the burn-off oven had been installed. He indicated that the oven was equipped with a device to continuously record temperature, as is required by the PTI.

Mr. Zaffarano also took us on a tour of the coating portion of the facility and walked us through the pre-treatment and coating processes. The pretreatment process is broken into four stages. In the first stage, the fence parts are sprayed with Bulk Kleen 655LF. The parts are then sprayed with city water, which is followed by reverse osmosis water. The final stage of pretreatment is the spraying of Bulk E-CLPS, which is primarily composed of water and fluotonic acid.

Following pretreatment, the fence pieces move to the coating lines. Elite Fence uses powder coatings. They electrostatically charge the fence parts and paint, so that there is efficient adhesion of the coatings. The leftover powder coatings are collected in a hopper and re-mixed with virgin powder coatings and re-used. The ventilation system in the coating room is equipped with fabric filters. There are no direct emissions to ambient air from the coating line. For the final stage of the process, the coated fence materials go through an infrared oven that cures the coatings.

#### Post-Inspection Meeting

AQD staff reminded Mr. Zaffarano that he will need to collect temperature readings and keep logs of calibration or maintenance activities on the burn-off oven, per PTI 130-18. He was also notified that if there are any additional changes to emission sources, such as the installation of emergency generators or the addition of any external venting emissions, Elite Fence Products should notify the AQD.

Mr. Zaffarano said he would notify me when the burn-off oven was operational.

After leaving the facility, AQD staff inspected the height of the stack attached to the burn-off oven. The stack

appeared to satisfy the requirement of being 1.5 times the building height.

### Exempt Equipment

AQD Staff Sam Liveson and Tyler Salamasick previously visited Elite Fences on April 28, 2016. This visit was prior to Elite Fences having applied for an air use permit and at the time, Elite Fence had an assigned SRN of U63190446. Per the assessment made during this inspection, it was determined that the equipment used during the coating process is exempt from the PTI process. Specifically, it was determined that the application of Bulk Kleen is exempt per Rule 290(2)(a)(ii), the spraying of reverse osmosis and city water is exempt per Rule 285(2)(m), and the powder coating booths are exempt per Rule 287(2)(d). The E-CLPS process was determined to be exempt per Rule 290(2)(a)(ii) following a review of the chemical components by AQD Toxics Staff Keisha Williams. The toxic literature review determined that the chemical was not carcinogenic and that levels used by the facility would not exceed potential threshold screening levels.

Based on my inspection of the facility and review of the applicable exemptions, I agree with the assessment made previously by AQD staff that the coating process is exempt from the requirement to obtain a Permit to Install.

### Conclusion

As the permitted burn-off oven is not currently operating, the facility is currently in compliance with the terms and conditions of its permit. A follow-up visit once the oven is operating may be necessary to ensure continued compliance.

NAME *Spencer Zebert* DATE 5/23/19 SUPERVISOR *SK*