DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

ACTIVITY REPORT: Scheduled Inspection

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FACILITY: Aristo-Cote Inc.		SRN / ID: N6938		
LOCATION: 24951 JOY BLVI	D, HARRISON TWP	DISTRICT: Southeast Michigan		
CITY: HARRISON TWP		COUNTY: MACOMB		
CONTACT: Jeremy Tice , Pla	nt manager	ACTIVITY DATE: 08/25/2015		
STAFF: Joyce Zhu	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT		
SUBJECT: scheduled inspect	ion			
RESOLVED COMPLAINTS:				

On 8/25, I conducted an air quality inspection at Aristo-Cote Inc., which is located on 24951 Henry B Joy Blvd., Harrison Twp. The inspection was initiated due to an active permit (#992-78) issued to Lakeside Enterprise, Inc. for the same site without any information about the facility. I arrived at the area around 12:30 PM. The location is now occupied by Aristo-Cote Inc. I met with Mr. Jeremy Tice, the plant manager. I introduced myself & explained the purpose of the inspection. Mr. Tice took me to see the process. When I came back to the office, I found out the location has another SRN code: N6938; whereas the SRN associated with Permit #992-78 is A3019. Under SRN # N6938, there is an opt-out permit (#21-01B) issued to Pelican Metal Products, LLC. On 9/1/2015, I emailed the company to request records according to Permit #21-01B requirements.

Inspection:

The company manufactures metal racks. Metal fabrication, such as cutting, welding, drilling, sawing, & grindings, is taken place inside the plant. All of these activities are vented to the general plant environment & are exempted from the permit to install requirements per Rule 285. In addition to the metal fabrication activities, there are three booths onsite. In one of the booths, there are two coating areas.

Permit # 21-08B

This permit covers four coating lines and two robotic plasma steel cutting stations. Francis Lim inspected the facility in2013. He has verified that the plasma cutting stations had been removed from the site. During my inspection, I saw a lot of overspray inside the booths. According to the company, they used airless spray guns in the coating process. However, Permit # 21-01B condition 1.8 requires the company to use HVLP.or comparable technology with equivalent transfer efficiency. In the Francis' inspection report, he indicated that the company used high solid paints. Only airless spray guns were suitable to this type of coatings. Since the high solid coating contains less amount of solvent, the result of releasing VOC emisson to the environment will be reduced significantly. Water is used to clean the guns. Paints were stored in closed containers in a room adjunct to the booths. I observed there was a missing filter in one of the booths while a painter was coating the racks. I pointed the practice to Jeremy. He immediately had someone to put the filter back into place. On an average, they operated the paint process 8 hours a day & five day per week. On 9/12, the company submitted the paint usage & VOC emission calculation records. The records show that the company used coatings with VOC contents less than 2 lbs./gal (permit limit 3.5 lbs./gal) during the period from September 2014 to August 2015. The

total VOC emission from the same period was less than 8 tons/12-mon (permit limit 30 tons/12-mon). This is also less than the single HAP emission limit of 9 tons/12-mon.

In conclusion, the company appeared to operate in compliance with permit # 21-01B requirements except filters were not placed correctly during the inspection; however, the company corrected the practice immediately when I pointed out. I'll go back to the company to make sure that they will have filters in place while coating. Since the company has an active permit (#21-01B) for their coating process. I'll advise permit section to void the permit #992-78.

NAME

DATE

SUPERVISOR