

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

N723667251

<b>FACILITY:</b> Conveyor Systems Inc.		<b>SRN / ID:</b> N7236
<b>LOCATION:</b> 167 N. Industrial Hwy., ALPENA		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> ALPENA		<b>COUNTY:</b> ALPENA
<b>CONTACT:</b> Leslie Davis , Environmental		<b>ACTIVITY DATE:</b> 04/27/2023
<b>STAFF:</b> Sharon LeBlanc	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Site inspection and records review as part of FY 2023 FCE. sgl		
<b>RESOLVED COMPLAINTS:</b>		

## INTRODUCTION

On April 27, 2023, AQD District Staff conducted an unannounced, scheduled site inspection of the Conveyor Systems Inc. (AKA CSI) Facility located at 167 N. Industrial Highway, Alpena, Michigan (N7236). One Permit to Install (PTIs) is associated with the Facility (145-03). Pat Eagling provided a site tour and answered questions regarding the Facility operations. Supplemental information was requested electronically on April 24, 2023, and received on April 26, 2023.

District files indicate that the last inspections were conducted on November 18, 2013, and January 16, 2019. Compliance issues were limited to the January 16, 2019, site visit and records review. Some reporting discrepancies that were the result of different staff completing the documentation. The Facility indicated that the corrections would be made.

## FACILITY

Located in an industrial park just off US 23 N. The Facility constructs conveyors. Activities associated with the facility includes preparation of structural steel conveyors and their components. Production volumes are based on orders. Materials are cleaned with water and iron phosphate to remove surficial oxidation, oils and other surface contamination prior to coating using a dry powder coating booth or wet coating booth. Except for the wet coating booth, production activities on site appear to be exempt from Rule 201 permitting and are discussed later in report.

To reach the site, travel north on US 23 N approximately 1.4- miles north of the intersection of Long Rapids Road and US 23 N. Make a left on N. Industrial Highway, and travel approximately four-tenths of a mile, following through the curve. The facility is located on the right-hand side of the road. There is no sign for the business. "167" is on the upper-right hand side of the building as viewed from N. Industrial Highway. There is no "visitor parking".

A review of aerial photographs indicated that the Facility was constructed sometime after 1998 but before May 2005. Adjacent industrial facilities appear to have been constructed prior to the Conveyor Systems building. Immediately adjacent facilities to the west and north included Great Northern Foods and Coca-Cola distribution centers, respectively. Panel Processing Inc. 120 N. Industrial Highway, (A0085) a flat panel fabrication facility is located approximately 0.25-mile to the south of CSI.

Weather conditions at the time of the site inspection consisted of mostly sunny skies, temperatures of apx. 40 degrees. No visible emissions were noted from the stacks associated for the Facility.

### PERMITTING

A review of District files and AQD Databases indicated that one opt-out permit was of record for the Facility at the present location. The referenced permit is summarized below:

Permit No.	Application Date	Issuance Date	Comment
145-03	6/11/2003	12/15/2003	dry filter paint spray booth

District Files indicate that prior to 2003, Conveyor Systems Inc. resided at 1995 Hamilton Road, Alpena, Michigan. Upon relocation, a new permit application was submitted by CSI and a new SRN issued. The 1995 Hamilton Road location is presently occupied by Quest Industrial, who operates equipment previously permitted to CSI under 251-97 for that location.

In addition to the permitted wet coating line (EU-BOOTH), the Facility also has metal cutting, grinding and welding activities. These activities are conducted such that any emissions associated with the activities are released into the work environment and appear to be exempt under Rule 285 (2)(I)(vi)(B)

*(I) The following equipment and any exhaust system or collector exclusively serving the equipment: .....*

*(vi) Equipment for carving, cutting, routing, turning drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blasting, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paperboard, wood, wood products, stone, glass, fiberglass or fabric which meets any of the following: .....*

*(B) Equipment that has emissions that are released only into the general in-plant environment ....*

Coating activities onsite are predominantly conducted using powder coating booth(s) and natural gas fired ovens (400 degrees Fahrenheit). Powder Coating activities associated with the Facility has been identified in previous site inspection reports as having been present as soon as 2003. They also were identified by District Staff as having been exempt from Rule 201 permitting under Rule 336.1287(d) which at the time of installation of the existing powder coating equipment stated:

*“A powder coating booth that has an appropriately designed and operated particulate control system and associated ovens.*

Effective December 20, 2016, the previously referenced exemption became Rule 336.1287(2)(d)) and reads:

*“ A powder coating booth and associated ovens, where the booth is equipped with fabric filter control. The fabric filter control shall be installed, maintained, and operated in accordance with the manufacturer’s specifications, or the owner or operator shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.”*

**REGULATORY**

A review of Permit application review and engineer notes indicated that the facility was evaluated for PM10 emissions. Classifications based on Potential to Emit (PTE) and other significant comments:

PARAMETER	CLASSIFICATION	COMMENT
NOx		
SO2		
CO		
Pb		
PM		
VOC	true minor	Title V Opt-Out Application
HAPs	true minor	Title V Opt-Out Application  Engineer Notes based on worst case emission of xylene.

**Applicable Federal Requirements:**

EMISSION UNIT	40 CFR SUBPART	TITLE
Source	Part 70	State Operating Permit Program

The Facility was evaluated for applicability of 40 CFR Part 63, Subpart HHHHHH -National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Applicability under this subpart includes use of chemical strippers containing methylene chloride (MeCl) and/or spray application of coatings containing the target HAPs of chromium, lead, manganese, nickel or cadmium. The Facility has confirmed

that they do not use MeCl, nor do any of their coatings contain any of the targeted HAPs and are therefore not subject to the referenced subpart at this time.

**40 CFR Part 63, Subpart M**, this subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations. Miscellaneous metal parts and products include a wide range of products including industrial machinery, metal pipes, and numerous other industrial, household, and consumer products. The Facility would not appear to be subject to the referenced subpart as it is not a major source of HAPs.

Note that at the time of report preparation, Part 6 Regulation (Emission Limitations and Prohibitions – existing Sources of VOC Emissions) changes have been updated (April 18, 2023) to address Ozone non-attainment issues in the State. The Facility coats metal parts, is located in Alpena County which is in attainment, and meets the definition of an existing source. Rule 336.1621 (10)(b) exempts from the provisions of Rule 336.1621 existing metallic surface coating lines not located in the 10 counties listed in 336.1621(10)(a), and with actual rate of emissions at the time of the inspection the actual VOC emission rate is less than/equal to 2,000 lb/month. Therefore, new restrictions under Part 6 Rule 336.1621 do not appear to apply to the Facility at this time.

#### EQUIPMENT

Permitted equipment onsite consists of one wet coating booth (EU-BOOTH). The unit consists of two air assisted airless guns and dry-filter particulate controls. The unit was in the process of being prepared for operation at the time of the January 16, 2019, site inspection. All of the filters were new and properly placed. CSI Staff were in the process of taping off work areas of product components. CSI reports that material usage is determined using stock reconciliation. The facility reports that use of the wet booth is infrequent and limited, as use of powder coating units are faster and cleaner. At the time of the inspection,

A review of records provided for 2022 and 2023 (to date) indicated that thinner usage is reported monthly and is normally between 60 -95 gallons per month. However coating application/usage associated with use of the permitted spray booth was limited to the month of February 2023. Therefore, the reported thinner usage must reflect the usage for the entire Facility. Monthly usage reported is summarized below:

<b>Month</b>	<b>Thinner Usage</b>	<b>Solvent based paint</b>	<b>Solvent based primer</b>	<b>Epoxy</b>
Jan. 2022	83	0	0	0
Feb. 2022	83	0	0	0
March 2022	84	0	0	0

April 2022	76	0	0	0
May 2022	76	0	0	0
June 2022	77	0	0	0
July 2022	95	0	0	0
August 2022	95	0	0	0
Sept. 2022	95	0	0	0
Oct. 2022	60	0	0	0
Nov. 2022	60	0	0	0
Dec. 2022	62	0	0	0
Jan. 2023	60	0	0	0
Feb. 2023	75	4	0	0
March 2023	60	0	0	0

**FGFACILITY** includes all equipment at the stationary source including equipment covered by another permit, grandfathered equipment and exempt equipment. As previously indicated, CSI only has one permit at this point in time. There is no grandfathered equipment associated with the Facility, and exempt equipment is addressed above.

Discussions with Facility Management Staff at the time of the January 2019, site inspection indicated that the Facility was seriously considering removal of the permitted equipment to increase interior storage space for construction materials. At the time of the April 27, 2023, site inspection the paint booth for wet application was still in place, and still being used for storage. Though records indicate that it was used the previous February.

### **COMPLIANCE**

Compliance status for the facility has been based on information provided during the April 27, 2023, site inspection, as well as on supplemental data and reports received on April 26, 2023.

District files indicate that no complaints have been reported against the Facility.

Emissions are reported annually as part of the MAERS program. A review of submittals indicated that the Facility submits the reports in a timely manner.

**PTI 145-03** – The referenced permit was issued for EU-BOOTH and FG-FACILITY. No material limits are associated with the PTI. Special conditions associated with the equipment include:

**OPERATION LIMITS** - The permittee is required to capture and store in a closed container all waste coatings and clean-up solvents. The captured materials are to be disposed of in an acceptable manner in compliance with all applicable rules and regulations. (SC 1.2)

Other operational conditions (or equipment requirements), include:

- EU-BOOTH is limited to operation of the equipment to times in which all respective exhaust filters are installed, maintained and operated in a satisfactory manner (SC 1.4)

At the time of the April 27, 2023, site inspection, EU-BOOTH was preparing for use. All dry particulate filters were in place and were in good condition. A review of aerial photos available for the facility shows no staining at/near the stack associated with the

- Disposal of spent filters in a manner which minimizes the introduction of air contaminants to the outer air. (SC 1.3)

The Facility reports proper disposal of spent filters, which have been minimal due to infrequent use of the permitted coating booth.

**EMISSION LIMITS** –The Facility maintains emission records on a quarterly basis. Records provided by the Facility included the following quarterly emissions:

Reporting Quarter	VOC Emissions (Tons)	HAPS Emissions (Tons)
1 <sup>st</sup> Quarter 2022	0.90	0.14
2 <sup>nd</sup> Quarter 2022	0.83	0.12
3 <sup>rd</sup> Quarter 2022	1.03	0.15
4 <sup>th</sup> Quarter 2022	0.66	0.01
1 <sup>st</sup> Quarter 2023	0.73	0.12
Limit	NA	NA

Limits associated with 145-03 is limited to the following 12-month rolling totals:

Emission Unit	VOC Emissions (TPY)	Aggregate
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## HAPs Emissions (TPY)\*

EU-BOOTH (2021)**	3.68	NR
EU-BOOTH (2022)	3.42	0.68
LIMIT	15 (SC 1.1)	22.5 (SC 2.1b)

\*Combined HAPs reported are so low that they are below single HAPs limits.

\*\* Totals reported via MAERS.

**TESTING ACTIVITIES** – Verification of VOC and water content, and density of any coating as applied and as received shall be determined using Federal Reference Test Method 24, or upon prior written approval by the AQD Supervisor by manufacturer’s formulation data. (SC 1.5) A review of the site inspection report for November 18, 2013, indicated that the Facility uses Method 24 to determine content.

However, as part of the January 16, 2019, and the April 27, 2023, site inspection Facility staff report the use of manufacturer’s formulation data. No copies of documentation approving use of the manufacturer’s formulation data was found in District Files, however this is a common method utilized by other Facilities and it is most likely that verbal approval was granted in the past.

Verification of HAPs content of any coating and other materials as received and applied may be required using EPA Test Method 311, at owners’ expense, if requested by the AQD District Supervisor. (SC 2.2) However, District files do not contain copies of a request for testing, therefore the conditions are not applicable at this time. CSI reports that HAPs content is obtained from manufacturer formulation/data sheets.

**RECORDKEEPING/REPORTING/NOTIFICATION** – The permittee is required to keep the following records on file for a minimum period of 5-years and made available to the Department upon request (SC1.8, 1.9 & 2.3):

•EU-BOOTH – Coatings

- Gallons (with water) of each coating used each month. (SC 1.8a)
- VOC content (minus and with water) of each coating as applied. (SC 1.8b)
- VOC mass emission calculations (tons) for each calendar month. (SC 1.8c)
- VOC mass emission calculations (tons) for 12-month rolling total each calendar month. (SC 1.8d)

•EU-BOOTH – Purge and Clean-up Solvents

- Gallons of each solvent used and reclaimed per calendar month. (SC 1.9a)
- VOC content, in pounds per gallon, of each solvent used. (SC 1.9b)
- VOC mass emission calculations (tons) for each calendar month. (SC 1.9c)
- VOC mass emission calculations (tons) for 12-month rolling total each calendar month. (SC 1.9d)

#### **·FGFACILITY –**

- Gallons or lbs of each material used each month. (SC 2.4a)
- Gallons or lbs of each material reclaimed. (SC 2.4b)
- HAP content, in lbs/gallon or lbs/lb for each material used. (SC 2.4c)
- Individual and aggregate HAP emission calculations determining monthly emission rate in tons/calendar month. (SC 2.4d)
- Individual and aggregate HAP emission calculations for tons/12-month rolling for each calendar month. (SC 2.4e)

**As previously indicated, CSI determines the volume of materials used based on inventory reconciliation. A review of Engineer notes associated with Permit 145-03 indicates that at the time of permitting, the District and the Facility agreed that monthly determination of usage and emissions would be a hardship for the Facility and agreed that quarterly emissions determination would be acceptable.**

**A review of records provided by CSI indicates that they group the types of coating and solvents used to the following categories: thinners, solvent-based paints, water-based paints, solvent-based primers and epoxies. Total usage is determined for each group, and VOC and HAP emissions are determined mass-balance, using the highest pollutant concentration reported for each grouping. Records were determined to be complete and met the general permit requirements.**

### **SUMMARY**

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Emissions associated with the Facility are well below permit limits, and activities associate with the Facility appear to be in general compliance with permit conditions.

NAME Mason J LeBlanc

DATE 6-5-23

SUPERVISOR Shane Nixon