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

| FACILITY: Niles Industrial Coat | ngs | SRN / ID: P0001 | | |
|---------------------------------|---------------------------------------|---------------------------|--|--|
| LOCATION: 422 Harrison, BAY | CITY | DISTRICT: Saginaw Bay | | |
| CITY: BAY CITY | | COUNTY: BAY | | |
| CONTACT: Jordan Bush , Safe | Manager | ACTIVITY DATE: 08/25/2016 | | |
| STAFF: Gina McCann | SOURCE CLASS: MINOR | | | |
| SUBJECT: Targeted inspection | for PTI #174-10 | | | |
| RESOLVED COMPLAINTS: | · · · · · · · · · · · · · · · · · · · | | | |

I (glm) conducted a targeted inspection of Boice Bird's facility in Bay City. The site was issued PTI# 174-10 on August 26, 2010. The General PTI is for coating lines emitting up to 10 TPY VOCs per line and 30 TPY VOCs site wide. The facility was bought by Niles Industrial Coatings and the acquisition final starting February 2015. A name change was made in MACES. No violations of air regulations were found during the inspection.

EUSHOP1: Compliant

The facility is used to sandblast and paint structural steel, steel pipe and fittings, ductwork, and miscellaneous steel items. The painting and sandblasting take place in an open floor plan warehouse that has been separated into different sections. The largest section is used for painting. There is an adjacent section used for sandblasting. An area at the back of the building contains offices, storage, and a break room. We viewed the paint application area, the sandblasting area, and their associated control devices.

The air filters used to control paint emissions are located in the center of a large space where paint is applied. The filters appeared to be installed and operating properly. Attached is a picture of the new filters installed.

For paint application the site uses HVLP, airless, and conventional cup guns, as well as some brushes and rollers.

I viewed VOC records for all of 2015 through July 2016. The site-wide 12 month rolling averages for VOC emissions were reviewed and were below permitted limit of 30 ton per year (tpy). Attached is a graph of the 12-month rolling time period of the VOC emissions starting February 2015 and running through July 2016. The facility appeared to increase steadily through late 2015 before leveling off and then declining in emissions.

The facility has a Rule 201 exempt sandblasting operation. The emissions are controlled by a 10,000 cfm cyclone dust collector followed by a custom designed collection bag. The cleaned air is returned into the sandblasting area. Collected solids are disposed of at Republic landfill in Pinconning, MI. The last two waste receipts are attached.

At the time of the inspection the facility appeared to be in compliance with PTI #174-10.

| NAME MIRCE R.M. | flann | _DATE 8/31/2014 | ⁾ SUPERVISOR | C. He | re |
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NON-HAZARDOUS SPECIAL WASTE & ASBESTOS MANIFEST

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| OPERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name | | | | | | | | |
| and are classified, packed, marked and | | | | | | | | |
| national governmental regulations. | | | ····· | | <u> </u> | | · | |
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| g. Operator's Name and Title (Print) | h. Signat | | | I. Date | | | | |
| Operator refers to the company which | owns, leases, operate | s, controls, or supe | rvises the facility bein | g demolished | or renovate | d, or the demo | lition or | |
| renovation operation or both | | | | | | | | |



8-30-16 An

McCann, Gina (DEQ)

From: Sent: To: Subject: Attachments: Jordan Bush <jordanbush@nilesplantservices.com> Tuesday, August 30, 2016 7:35 AM McCann, Gina (DEQ) SDS binder returned Niles-MDEQ update.pptx

Good morning Gina,

I just wanted to follow up with you, that I returned the PDS/TDS/EDS & SDS binders back to the Bay City office yesterday. I also checked on the air filters to see if they did get switched out at the end of the week or not; yes they did get changed out (attached).

SGT Jordan W. Bush (USA Retired) Safety Manager Niles Plant Services LLC (w) (810) 714-5913 (c) (810) 224-1317 www.nilesplantservices.com

"Think Safety"

McCann, Gina (DEQ)

| From: | Jordan Bush <jordanbush@nilesplantservices.com></jordanbush@nilesplantservices.com> |
|--------------|---|
| Sent: | Friday, August 26, 2016 8:59 AM |
| То: | McCann, Gina (DEQ) |
| Cc: | Scott Avendt; Chuck Stickney |
| Subject: | RE: Inspection Follow Up |
| Attachments: | Niles Bay City Yard turn-in.pdf |

Good Morning Gina,

Attached are our last two turn-in receipts for the paint/solvent waste and blast media that has been turned-in, I am working on scheduling another turn-in of waste paint for the location in the next couple months during my housekeeping inventory. The Bay City location has been good about maximizing use / minimizing excess material that they currently use. I do not have the disposal documents for Boice Bird for historical record/maintenance. With the exception of this week it has been very slow for blast/paint operations on a day-to-day basis, which is evident by such a small quantity of waste material being generated.

Scott Cross whom I deferred my knowledge to some of your answers to the questions about some of the day-to-day operations and air filter / dust collector questions is away from a computer due to being on a job, but he would like to schedule a conference with myself and Scott (Avendt) call if possible with you today after 1 pm so he will be able to answer them for you and any follow-ons that you may have of him.

If the time works for you or a need to reschedule to next week please let me know.

Thanks,

SGT Jordan W. Bush (USA Retired) Safety Manager Niles Plant Services LLC (w) (810) 714-5913 (c) (810) 224-1317 www.nilesplantservices.com

"Think Safety"

From: McCann, Gina (DEQ) [mailto:McCannG2@michigan.gov] Sent: Friday, August 26, 2016 8:15 AM To: Jordan Bush Cc: Chuck Stickney Subject: Inspection Follow Up

Hi Jordan,

Thank you for taking the time to meet with me yesterday. In follow up to the inspection I have a couple of questions/requests. During the walk though I asked about filters and how often they are changed. Can you provide me with this information?

Additionally, I meant to ask about disposal records. Who picks up? How much? Etc...

Please send a copy of the last 2 waste receipts for the paint and dust collector.

Thank you and enjoy your weekend,

Gína L. McCann

Senior Environmental Quality Analyst

DEC Air Quality Division Saginaw-Bay District Office 989-894-6218

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