

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

P020466655

FACILITY: EEI Global		SRN / ID: P0204
LOCATION: 1601 W HAMLIN RD, ROCHESTER HLS		DISTRICT: Warren
CITY: ROCHESTER HLS		COUNTY: OAKLAND
CONTACT: Jeff Cook , Manager		ACTIVITY DATE: 03/07/2023
STAFF: Adam Bogнар	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

On Tuesday, March 7, 2023, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, I, Adam Bogнар conducted a scheduled inspection of EEI Global, located at 1601 West Hamlin Road, Rochester Hills, MI 48309. The purpose of this inspection was to determine the facility’s compliance status with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules.

Prior to May 2022, Prefix Corporation used this building for painting and doing custom work on automobiles. In early 2022, Prefix and EEI Global switched facilities. Prefix relocated to 1400 Livernois, Rochester, MI which was previously occupied by EEI Global. EEI Global moved into 1601 West Hamlin, renovated the facility, and began their fabrication work at this location on May 18, 2022. All manufacturing equipment from Prefix was removed from the facility with the exception of one paint booth.

I arrived at EEI Global at around 1 pm. I met with Jeff Cook, Manager. I identified myself, provided Jeff with my business card, and stated the purpose of the inspection. Jeff showed me around the facility and provided me with the records I requested.

EEI Global operates Monday through Friday from 8 am to 5 pm. There are around 48 total employees – 22 on the manufacturing floor and 26 office workers.

EEI Global describes themselves as “an award-winning experiential marketing agency with world-class design, strategy and fabrication.” They work with businesses in creating marketing displays for events, tours, and trade shows. Automotive trade shows make up a significant part of their work. Nothing is “manufactured” at this facility. Every job is custom fabricated for specific product (s)/event(s).

EEI Global operates a wood shop equipped with a dozen or so machining operations including a CNC router. I observed that all the wood shop machining operations were exhausted to a dust collector. The dust collector is located inside the plant and recycles the cleaned air back into the plant. None of the machining exhaust is exhausted to the ambient air. Based on my observations during this inspection, these machining operations are exempt from Rule 201 requirements pursuant to Rule 285(2)(l)(vi)(B).

There is one downdraft paint booth at this facility. This booth is leftover from when Prefix occupied this facility. I verified that the booth was equipped with exhaust filters located in the floor. Jeff stated that the filters are changed as needed. Jeff provided me with the invoices/purchase orders

for all of the paint purchased since inception. In general, paint is purchased as needed since each job is custom. Jeff put together a spreadsheet showing how much paint is used on a monthly basis. I verified that coating usage is less than 200 gallons/month (minus water). Total coating usage between May 18, 2022 and January 4, 2023 was 475 gallons. Based on my inspection and record review, this downdraft coating booth is exempt from Rule 201 requirements pursuant to Rule 287(2)(c).

Active PTIs

Permit to Install Nos. 73-15 and 68-15 are active permits at this location. I did not evaluate compliance with all conditions of these permits since the facility does not operate most of the equipment covered by these permits. The single coating booth is the only piece of equipment that is associated with these permits.

Based on the records I reviewed while on site, the highest amount of coating used in a single month was 60 gallons. Using a worst case scenario VOC/HAP content of 7.5 lb/gallon shows that EEI global would have monthly VOC/HAP emissions of 450 lbs per month. In this worst case scenario, EEI global would meet the 2000 lb/month VOC emission limit in PTI 68-15. If we consider this worst case scenario for a 12-month period, total VOC/HAP emissions would be 5,400lbs which meets the 18,000lb/year individual HAP emission limit in PTI 73-15 as well as the 10 ton per year VOC limit from PTI 68-15.

I observed that all purge/clean-up solvents and waste coatings were stored in closed containers located in a paint mix room next to the paint booth. Fresh paints were stored in an organized manner with lids closed.

I recommended to Jeff that he request to void Permit to Install Nos. 73-15 and 68-15 by sending a request to Sue Thelen, Department Tech (thelens4@michigan.gov). Jeff stated that he would send in this request. If these PTI's are not voided, then compliance with these permits will be evaluated during future inspections.

1300 West Hamlin

This address also used to be part of Prefix Corporation at this SRN. EEI Global does not occupy this building. There does not appear to be any business currently at this location. I saw a sign posted on the front door stating that the city of Rochester issued a permit for a collision center to be constructed at this location.

Compliance Determination

Based on the findings during my inspection and record review, EEI Global is in compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451; and Michigan Department of Environment, Great Lakes, and Energy, Air Quality Division (EGLE-AQD) rules.

NAME Adam Bogner DATE 3/22/2023 SUPERVISOR K. Kelly