

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

P040162573

FACILITY: SEBRIGHT PRODUCTS INC.		SRN / ID: P0401
LOCATION: 2631 12TH STREET, WAYLAND		DISTRICT: Kalamazoo
CITY: WAYLAND		COUNTY: ALLEGAN
CONTACT: Jason Trumbull , Safety Coordinator		ACTIVITY DATE: 03/04/2022
STAFF: Cody Yazzie	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS:
SUBJECT: Onsite Inspection		
RESOLVED COMPLAINTS:		

On March 4, 2022 Air Quality Division (AQD) staff (Cody Yazzie) arrived at 2631 12th Street, Wayland Michigan at 2:00 PM to conduct an unannounced air quality inspection of Sebright Products (hereafter Sebright) SRN (P0401). Staff made initial contact with an onsite employee that was able to get ahold of the environmental contact. Jason Trumbull, Sebright, Safety Coordinator, is the environmental contact and arrived shortly thereafter and took staff to his office for further discussions.

Sebright is a facility that builds large compactors and dewatering equipment. The facility has roughly 54 employees that work on 2 shifts per day typically Monday through Friday. Sebright was last inspected by the AQD on February 12, 2013 and appeared to be in Compliance at that time with the state of Michigan AQD regulations. Staff asked, and Mr. Trumbull stated that the facility does not have any emergency generators, boilers, or cold cleaners.

Mr. Trumbull gave staff a tour of the facility. Required personal protective equipment are a high visibility vest, safety glasses, hard hat, and steel toe boots. Staff observations and review of records provided during and following the inspection are summarized below:

General PTI No. 28-15:

The facility has a large painting booth that is similar to what may be used in an automotive body shop. The unit is fully enclosed with filters for the exhaust and for the inlet. This paint booth currently operates under the issued General PTI No. 28-15. There is no thermal oxidizer or catalytic oxidizer that is used for control, which deems Special Conditions IV.3-5, Special Conditions VI.1-2, and Special Conditions VI.5-7 as not applicable.

Special Condition VI.3 requires recordkeeping that allow for the calculations of the VOC emissions on a calendar month and 12-month rolling basis. During the inspection Mr. Trumbull indicated that these calculations were not being kept. Mr. Trumbull indicated that the facility does keep monthly coating usage records but did not have them on hand during the inspection. Staff indicated that the General PTI does have Calendar monthly and 12-month rolling emissions limits. The required recordkeeping is needed to show compliance with these limits. Staff indicated that a violation notice would be sent to the facility for this violation of recordkeeping permit requirements.

Staff was provided with the Manufacturer's Data sheets for the coatings that are used in the coating booth. Staff explained to Mr. Trumbull that the information regarding the VOC content density found on the Manufacturer's Data sheet are used in a format like what can be seen in Appendix B of General PTI No. 28-15 to calculate and record the VOC emissions.

During the inspection Staff did note that the facility did appear to be capturing all waste coatings from all coating applicators. In addition, it was noted that the facility uses a Finishline FLG4 applicator. These applicators appear to be high volume-low pressure (HVLP) applicators as required by the General PTI No. 28-15.

Staff did observe the stack during the inspection. The exhaust stack was observed to be unobstructed vertically upwards as required by the PTI.

During the inspection it was discussed by Mr. Trumbull that a second paint booth may be added to the facility. Staff indicated that the facility could do this under their current General PTI No. 28-15, however the facility would have to submit an EQP5759 form prior to installing the new equipment. These requirements are outlined in Special Condition IX.1

The facility has an FG-SOURCE table which has a VOC emission limit for all the coating lines and associated clean-up operations at the stationary source. Since the facility has only 1 coating line at the facility the FG-COATING and FG-SOURCE are the same monthly and 12-month rolling calculations. As indicated previously the facility has not been maintaining these records.

Plasma Cutting:

The facility has a plasma cutting table. During the previous inspection it was noted that the facility was utilizing the permit exemption rule 285(2)(I)(vi)(B) which means the exhaust was only to the general in-plant environment. Since the previous inspection the facility had installed an exhaust capture system that routed out the side of the building. Staff indicated that if the facility was going to keep the installed exhaust capture system the facility would also need to install an appropriate fabric filter collector device to control emissions from the exhaust. This would be in accordance with Rule 285(2)(I)(vi)(C). Staff indicated to Mr. Trumbull that a violation notice would be sent for this as well.

Welding:

The facility does conduct and utilize different types of welding equipment. The welding equipment appears to meet permit exemption Rule 285(2)(i).

Non-Compliance:

At the time of the inspection and based on a review of records obtained during or following the inspection, the facility appears to be in non-compliance with General PTI No. 28-15 and Rule 201 of the AQD regulations. Staff stated to Mr. Trumbull that a report of the inspection would be sent to the facility for their records. Staff concluded the inspection at 3:00 PM.-CJY

NAME Cody Younger

DATE 4/13/2022

SUPERVISOR R/L 4/14/2022