

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

P077345361

FACILITY: Spring Arbor Coatings - Fowlerville		SRN / ID: P0773
LOCATION: 895 Garden Lane, FOWLERVILLE		DISTRICT: Lansing
CITY: FOWLERVILLE		COUNTY: LIVINGSTON
CONTACT: Isabella Jones , Manufacturing Engineer		ACTIVITY DATE: 07/11/2018
STAFF: Samantha Braman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: First inspection at this facility. Unannounced, scheduled inspection.		
RESOLVED COMPLAINTS:		

**Safety Equipment Required:** Steel-toed boots, earplugs and safety glasses.

**Purpose:** Unannounced, scheduled inspection by Sam Braman and Dan McGeen for compliance with permit No. 116-17A.

**Location:** Spring Arbor Coatings is in the town of Fowlerville in a small industrial park. The facility is approximately 500 feet from the Red Cedar River and 1,270 feet from the nearest residence. There is a forest buffer between these areas, (map attached).

**Facility Background/Regulatory Overview:** Spring Arbor's main operations consist of electrodeposition coating of steel automotive components. This facility operates on 2 shifts, 5 days per week.

**Spring Arbor Coatings operates under a synthetic minor permit, Permit to Install (PTI) 116-17A for two electrodeposition coating lines and curing ovens issued on 3/20/2018.**

A *synthetic minor* permit limits the facility's potential to emit (PTE) for five of the criteria pollutants: carbon monoxide, nitrogen oxides, sulfur dioxides, volatile organic compounds, and particulate matter to keep it from becoming a major source.

**Fee Status:** This facility does not belong to a category fee and is not required to report to MAERs.

**Materials Provided:** Business card and Exemption Book

**Inspection:**

Arrived: 9:27 AM

Departed: 11:00 AM

There were no visible emissions from the facility upon arrival. No odors were identified in the residential area to the East or on Garden Lane approaching the facility.

This is a new facility. This was the first inspection at Spring Arbor Coatings - Fowlerville.

Upon arrival we were first greeted by Jeff, assistant plant manager. We were later join by Pete the plant manager, who gave Dan and I a tour of the plant. First, we were shown Coating line 1, which consist of a total of 13 dip tanks. The line utilizes two exhausts. The first one is a pretreatment exhaust for the phosphate and the cleaner. The line uses .5 gal of VOC paint and utilizes an Ultra Filter. The second exhaust is for the natural gas oven, which is kept at about 400 degrees F to cure paint.

The second coating line started up last week and has the same exhaust system. (See flow chart attached)

This Fowlerville facility produces less than 10 TPY of VOCs per coating line per the condition in their permit. With both lines running full time they expect to be closer to that limit, but still under. Due to the footprint of the facility, Spring Arbor Coatings – Fowlerville is limited on their growth.

No.	Emission Unit	Description	Permit No. or Exemption	Comp. Status
1	EUCOATINGF1	Electrodeposition steel coatings line with curing oven.	PTI 116-17A	C
2	EUCOATINGF2	Electrodeposition steel coatings line with curing oven.	PTI 116-17A	C
3	Boiler 1	Natural gas fired boiler; 1 million btu. Serves e- coat line 1.	Exempt 282(b)(i)	C
4	Boiler 2	Natural gas fired boiler; 3,075,000 btu. Serves e- coat line 2.	Exempt 282(b)(i)	C

**Recordkeeping:** Isabella Jones, Manufacturing Engineer, joined us after the facility tour for our recordkeeping discussion. She provided us with more information about the facility, and promptly emailed us all their recordkeeping documents that we requested. Upon further review of the materials back at the office it appeared that Spring Arbor was exceeding their Material limits of 0.7 lb/gal (minus water) as applied limit outlined in Condition II of their permit for EUCOATING1. Bob Byrnes and I held a conference call on 7/26/18 to communicate this information with Isabella. Later, she noted that some of the solvent had been used to clean rather than used in the paint mixture, and she would send me the revised usage data. Upon reviewing this new data, it appeared that Spring Arbor was under the 0.7 lb/gal limit, except for March 2018, which the VOCs reached 0.99 lbs/gal.

**Summary:** Spring Arbor Coatings is well below their emission limits of 10 tons per year of VOCs, but over their instantaneous material limit of 0.7 lb/gal (minus water) as applied VOC limit. Isabella has already begun taking corrective actions on behalf of Spring Arbor Coatings. She will be putting in an application for a permit to modify their existing material emissions limit. Isabella also indicated improved record keeping will be kept in the future. Compliance status was pending corrective actions.

As of 7/30/18 Isabella has been in touch with Jeff Khaled in permitting to modify the permit. No violation letter will be sent provided that Spring Arbor follows through with their permit modification.

Update: As of August 15th, 2018 a new Permit to Install NO. 116-17B has been issued with a revised emission unit limit of 1.1 lb/gal VOCs instantaneous for the coating lines.

NAME Sau Ma Breen

DATE 8/24/18

SUPERVISOR [Signature]