

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

P079069245

FACILITY: Fletcher Precision Machine Painting, Inc.		SRN / ID: P0790
LOCATION: 6795 E. 9 Mile Road, WARREN		DISTRICT: Warren
CITY: WARREN		COUNTY: MACOMB
CONTACT: Terry Fletcher , Owner		ACTIVITY DATE: 07/05/2023
STAFF: Noshin Khan	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: scheduled, on-site inspection		
RESOLVED COMPLAINTS:		

On Wednesday, July 5, 2023, I, Noshin Khan, Michigan Department of Environment, Great Lakes, and Energy-Air Quality Division (EGLE-AQD) staff, performed a scheduled, on-site inspection of Fletcher Precision Painting located at 6795 East 9 Mile Road, Warren, Michigan 48091 (SRN: P0790). The purpose of the inspection was to determine the facility's compliance status with the requirements of the federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 Public Act 451, as amended (Act 451); the AQD administrative rules, and the conditions of Permit to Install (PTI) Number 161-17.

I arrived at the facility at 10AM and met with Terry Fletcher, Owner, and Autumn Fletcher, Office Manager. Terry described the facility's processes as painting of metal parts, frames, electrical enclosures, and other various parts made of steel and aluminum. The facility operates 7AM-3PM, Monday through Friday, and always has 1 employee on site. When I first contacted Terry about performing the inspection, he informed me that the site was completing its last few jobs estimated that coating operations would cease by June 30, 2023. During my inspection, Terry reiterated that he expected the facility to cease coating operations in the coming weeks.

AQD staff Kaitlyn Leffert had issued a violation on October 10, 2022 for not maintaining acetone emission calculations or VOC emissions calculations. According to Terry and Autumn, Kaitlyn assisted them in correcting their VOC calculations. According to Terry, the facility rarely uses acetone as of about November 2022, and I did not observe acetone used for pretreatment during my inspection. A water-based cleaner is used for the pretreatment of materials, which is the process covered under EUSOLVENT in the permit.

After discussing the facility's operations, Terry and Autumn walked me through the facility. The facility currently operates one booth, which I observed. I observed that spray guns were submerged in xylene for cleaning. The other booth is now used a prep station and coating is not performed in it. I observed two curing ovens locked shut.

During the walkthrough, I observed all coatings and waste solvents, except for those in use, stored in closed containers, in compliance with EUSOLVENT Special Condition (S.C.) III.1-III.2 and FGRULE621 S.C. III.1-III.2. Terry showed me where waste is stored in 55 gallons drums, which I observed were closed, and he said that Heritage collects the waste for disposal. In the office, I observed that the facility maintains SDS sheets including the chemical composition of each material, in compliance with S.C. VI.3, in a binder, and the facility sent me SDS sheets for current coatings used.

In the back of the production area is a parts storage and warehouse area. I did not observe any emergency generators, boilers, or parts washers.

EUSOLVENT

This emission unit covers pretreatment and cleaning of metal parts in preparation for application of coatings using acetone.

Per Special Condition (S.C.) I.1, the facility is subject to an acetone emission limit of 150.3 lb/yr based on a 12-month rolling time period as determined at the end of each calendar month. The facility did not provide acetone usage or emissions calculations required by S.C. VI.2. I had requested purchase records to be able to verify that acetone is rarely used, but these were also not provided.

Per S.C. II.1, the permittee shall not use materials containing VOCs or HAPs in EUSOLVENT. As discussed, Terry told me a water-based cleaner is used and provided an SDS. The cleaner is called "No Rinse Prepaint Cleaner" and is composed of up to 5% by weight of dipropylene glycol monomethyl ether (DPM). This compound appears to be a VOC and use of the cleaner is consequently a violation of S.C. II.1. The facility does not record how much of the water-based cleaner is used.

FGRULE621

The conditions of this flexible group apply to the operation of coating lines, including the use of a wiping substrate, the paint storage area, a mixing station, and a paint spray booth. Per Terry, spray guns are cleaned using xylene.

S.C. I.1 sets a VOC emission limit of 9.8 tpy based on a 12-month rolling time period. S.C. I.2 sets a VOC emission limit of 2,000 lb/month.

S.C. II.1 sets a material limit of 10.0 gallons/day for all coatings and cleaning solvents.

The facility provided monthly sheets from September 2022 through August 2023 which indicate daily primer and paint usage, VOC content, and VOC emissions from primer and paint. The records indicate that the primer and paint use is below the material limit of 10.0 gallons/day. However, the records do not include usage of purge and clean-up solvents, including xylene, or VOC emission calculations from the use of these solvents. The facility's records consequently don't include all items required by S.C. VI.2.

The facility provided a spreadsheet summarizing monthly VOC emissions in tons. However, these calculations only include VOC emissions from paint and primer, and not from purge and clean-up solvents as required by S.C. VI.2. The sheet has a section for 12-month rolling VOC emissions but values are not entered and calculations have not been maintained, in violation of S.C. VI.2.e.

I was unable to verify compliance with S.C. I.1 or I.2, or II.1 since the material usage records and VOC calculations are incomplete.

Conclusion

Based on my observations during the inspection and the records reviewed, the facility is in violation of EUSOLVENT S.C. II.1 and VI.2, and FGRULE621 S.C. VI.2, and a violation notice will be issued.

NAME Nashir Khan

DATE 10/02/2023

SUPERVISOR K. Kelly