

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

N087157835

FACILITY: Conformance Coating and Prototype, INC		SRN / ID: N0871
LOCATION: 2321 BUSHA HWY, MARYSVILLE		DISTRICT: Warren
CITY: MARYSVILLE		COUNTY: SAINT CLAIR
CONTACT: Jeff Jones , Owner and President		ACTIVITY DATE: 04/14/2021
STAFF: Shamim Ahammod	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Conducted an onsite scheduled inspection of Conformance Coatings & Prototype, Inc (SRN# N0871) to determine the facility's compliance with the requirements of the Permit to Install (PTI) No. 75-04.		
RESOLVED COMPLAINTS:		

On April 14, 2021, Michigan Department of Environment, Great Lakes and Energy (EGLE) - Air Quality Division (AQD) staff, I, Shamim Ahammod, conducted an onsite scheduled inspection of Conformance Coatings & Prototype, Inc (SRN# N0871) located at 2321 Busha HWY, Marysville, Michigan. The purpose of the inspection was to determine the facility's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) and the Air Pollution Control Rules and Permit to Install (PTI) No. 75-04.

SOURCE DESCRIPTION

Conformance Coatings paints automotive and non-automotive plastic parts, and some plastic business machine parts (very limited at this time). The facility operates six paint spray booths, three natural gas-fired ovens (2 inline ovens with overhead conveyors and 1 batch oven), and three infrared lights for curing. Currently, the facility operates just 1 shift, 5 days per week.

Pre-Inspection

Due to COVID -19, before conducting onsite inspection, I requested the facility personnel to send me the VOC emissions and HAP emissions records. I received and reviewed the records on April 8, 2021.

INSPECTION & REGULATORY ANALYSIS

On April 14, 2021, I arrived at the facility at 2:45 PM. I entered the front lobby of the office and met with Mr. Jeff Jones 'JJ' President and Owner of Conformance Coatings & Prototype (CCP), Inc and Mr. Wayne Hertlein, General Manager of CCP. During the inspection, Mr. Jones, Mr. Hertlein and I walked through the facility and observed following plastic parts coating line: EGCCPBOOTH0001, EGCCPBOOTH0002, EGCCPBOOTH0003, EGCCPOVEN0004, EGCCPBOOTH0005, EGCCPBOOTH0006 and EGCCPBOOTH0007.

According to Mr. Jones, the permittee uses the following emission unit frequently: EGCCPBOOTH0003, EGCCPBOOTH0006 and EGCCPBOOTH000. The permittee does not use the EGCCPBOOTH0002 frequently. EGCCPBOOTH0001 will be replaced soon without any modification of the unit.

FGPPCOATING

Emission Limits

Special Conditions	Pollutant	Equipment	Emissions record from January through December 2020	Limit	Time Period	Testing/Monitoring Method
SC 1.1a	VOCs	FGPPCOATING	6.4896 ton	30.0 tpy	12-month rolling	SC 1.10
SC 1.1b	VOCs	Each Individual Emission Unit Portion of	Maximum VOC content was 6.5 lb/gallon in October, 2020		Calendar month	SC 1.12 & SC 1.13

Special Conditions	Pollutant	Equipment	Emissions record from January through December 2020	Limit	Time Period	Testing/Monitoring Method
		FGPPCOATING When Coating of Plastic Business Machine Parts.		11.96 pounds per gallon of solids applied		
SC 1.1c	VOCs	Each Individual Emission Unit Portion of FGPPCOATING.	Maximum VOC emission was 985.85 lb on Feb 2020 from Line 6 (EGCCPBOOTH0006)	2000 pounds	Calendar month	SC 1.11
SC 1.1d	VOCs	Each Individual Emission Unit Portion of FGPPCOATING.	Maximum VOC emission was 3.115 ton from Line 6 (EGCCPBOOTH0006)	10.0 tpy	12-month rolling	SC 1.11

Process/Operational Restrictions

As specified in SC 1.2, at the time of inspection, containers of coatings, reducers, solvents, and thinners were covered. Per SC 1.3, spent filters are taken from machines, inspected for hazardous metals, and then dried for a period of 48 hours before disposal. After the spent filter has been dried, the spent filter is then placed in a containment bag, sealed and disposed of with other commercial refuse in the proper disposal unit. Safety data sheets to ensure compliance and minimization of contaminants are kept on each spray line and filled out for each spent filter.

Equipment

As required in SC 1.5, I observed exhaust filters were installed with the paint spray booth portion of FGPPCOATING. These exhaust filters were in good conditions and appears exhaust filters were maintained and operated in a satisfactory manner.

Recordkeeping /Reporting/Notification

Per SC 1.9, the permittee maintains a current listing from the manufacturer of the chemical composition of each coating including the weight percent of each component. As specified in SC 1.10, the permittee shall keep the following information on a monthly basis for for FGPPCOATING:
 Gallons (with water) of each coating used and, if applicable, reclaimed

- a. Gallons (with water) of each coating, reducer, catalyst, additive, purge solvent, and clean-up solvent used
- b. VOC mass emission calculations determining the monthly emission rate in tons per calendar month
- c. VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.
- d. Hours of operation

The permittee provided me an MS excel sheet containing all the information required by SC 1.9. a through d. Based on my review the record , I found the permittee maintain the record of gallon of each coating used in the each emission units. The permittee maintains the VOC emissions record monthly as well as 12-month rolling basis as described in SC 1.1a-d (Emission Limit) of FGPPCOATING.

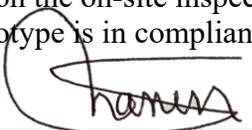
FGFACILITY

The following conditions apply to: FGFACILITY

Emission Limits

Special Conditions	Pollutant	Equipment	Emissions record from Jan. through Dec. 2020	Limit	Rule/Permit Condition Violated	Compliance
2.1a	EACH INDIVIDUAL HAP	FGFACILITY	Maximum individual HAP, Xylene emission was 0.105 ton.	Less than 9.0 tons per year	PTI No. 75-04 FGFACILITY SC 2.1a	Yes
2.1b	Aggregate HAPs	FGFACILITY	0.4548 ton	Less than 22.5 tons per year	PTI No. 75-04 FGFACILITY SC 2.1b	Yes

Based on the on-site inspection, reviewing records and discussion with staff, Conformance Coatings & Prototype is in compliance with the requirements of Permit to Install (PTI) No. 75-04.

NAME 

DATE April 28, 2021

SUPERVISOR 