

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

N2005  
FY 2016 Insp-

N200531785

FACILITY: AFCO MFG CORP	SRN / ID: N2005
LOCATION: 428 COGSHALL, HOLLY	DISTRICT: Southeast Michigan
CITY: HOLLY	COUNTY: OAKLAND
CONTACT: Dawn Holbrook, President	ACTIVITY DATE: 10/02/2015
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Non Compliance
SOURCE CLASS: Minor	
SUBJECT: FY 2016 scheduled inspection of AFCO Manufacturing Corporation ("AFCO Mfg.")	
RESOLVED COMPLAINTS:	

N2005 - SAR - 2015 10 02

**AFCO Manufacturing Corporation (N2005)**  
428 Cogshall  
Holly, Michigan 48442-1756

[www.afcomfg.com](http://www.afcomfg.com)

**Permit: Permit-to-Install (PTI) No. 376-88 dated March 31, 1989 for primer dip coating process**

**VN: AQD issued October 19, 2015. Violation Notice (VN) for PTI No. 376-88 and Rule 336.1201**

On October 02, 2015, I conducted a level 2 **scheduled** inspection of AFCO Manufacturing Corporation ("AFCO Mfg."), which is in a business of manufacturing and fabricating steel structural products for home construction industry, located 428 Cogshall, Holly, Michigan 48442-1756. The inspection was conducted to determine compliance with the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451 and Michigan Department of Environmental Quality, Air Quality Division (MDEQ-AQD) administrative rules.

During the inspection, Mr. Mike Myers (Phone: 800-743-4415 or 248-634-4415; Cell: NA; Fax: 248-634-6301; E-mail: [afcomfg@sbcglobal.net](mailto:afcomfg@sbcglobal.net)), assisted me.

Neither Mr. David A. Nash (Phone: 800-743-4415 or 248-634-4415; Cell: NA; Fax: 248-634-6301; E-mail: [afcomfg@sbcglobal.net](mailto:afcomfg@sbcglobal.net)), VP, nor Ms. Dawn F. Holbrook (Phone: 800-742-4415 or 248-634-4415; Cell: NA; Fax: 248-634-6301; E-mail: [afcomfg@sbcglobal.net](mailto:afcomfg@sbcglobal.net)), President, was present.

AFCO Mfg. is in business fabricating and manufacturing steel products for construction industry; mostly home construction. AFCO Mfg. makes Zip adjustable steel columns. AFCO Mfg. also makes steel beams, steel columns and other steel and safety products.

Steel tubes are received and they are of proper size (length and diameter). Therefore, hardly any cutting takes place. Four MIG welding machines are present and exhaust is **not** discharged to outside ambient air. The welding machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(i).

**PTI No. 376-88 (dip coating) and open (no booth) spray coating**

The products are prime coated using a dip tank; in some cases spray coated. AFCO Mfg. is not in compliance with PTI No. 376-88 (dip coating) and Rule 336.1201 (open spray coating):

1. SC 16: VOC and coating records. AFCO Mfg. failed to keep coating usage records and perform monthly calculations.
2. SC 17: Cover dip tank at all times. AFCO Mfg. kept the dip tank lid open as a matter of practice. Also, coatings were spilled in the vicinity via dripping from coated parts.
3. Rules 336.1201 and 336.1287(c): In addition, AFCO Mfg. installed and operated open spray coating process without a paint spray booth with filter system.

AQD issued October 19, 2015, violation notice for the above.

AFCO Mfg. coats structural steel parts (mostly columns) with water based prime coating (black, red, and grey) as follows:

1. Red dip primer 4-23-12: 1.34 pounds of Volatile Organic Compounds (VOC) per gallon of coating (160.8 g/L)
2. Red spray primer 4-22-50B: 1.66 pounds of VOC per gallon of coating (199.2 g/L)
3. Flat black primer 518-10B: 1.57 pounds of VOC per gallon of coating (188.4 g/L)
4. Grey spray enamel 236-80C: 3.27 pounds of VOC per gallon of coating (392 g/L). Grey spray enamel coating appears to be solvent-based as indicated by high VOC content.

According to Mr. Myers, grey spray coating accounts for 2% percent of the total coatings used and AFCO Mfg. uses about 150 gallons of coatings per month.

### **Conclusion**

AFCO Mfg. not in compliance. AQD issued violation notice for Rule 336.1201 and PTI No. 376-88.

**FYI: VN**

October 19, 2015

SRN: , County

48442-1756

Dear :

**VIOLATION NOTICE**

On , the Department of Environmental Quality (DEQ), Air Quality Division (AQD), conducted an inspection of ) located at 428 Cogshall Street, Holly, Michigan. The purpose of this inspection was to determine 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); the administrative rules; and the conditions of Permit to Install (PTI) number 376-88.

During the October 02, 2015, inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Primer dip coating process, dip coating tank (12 ft. L * 5 ft. W * 5 ft. H)	PTI No. 376-88, Special Condition (SC) 16: VOC and coatings records	AFCO Manufacturing Corporation (AFCO Manufacturing) failed to keep coating usage records and calculate monthly VOC emissions. MS Excel may be used for the required calculations such that the calculations methods, procedures, format are acceptable to AQD.
Primer dip coating process, dip coating tank (12 ft. L * 5 ft. W * 5 ft. H)	PTI No. 376-88, SC 17: keep dip tank covered at all times	On October 2, 2015, AQD staff observed that AFCO Manufacturing kept the lid open as a matter of practice. Also, the paint was spilled in the vicinity of the dip tank via dripping from the parts being coated (steel pipes).
Paint spray process on the open floor	Rule 336.1201 (Permit-to-Install)	AFCO Manufacturing installed the Spray Painting Process without obtaining a Permit-to-Install prior to commencing the painting operation. The spray painting is done without any booth and without a paint overspray particulate matter control system. <sup>θ</sup>
<p><sup>θ</sup> Alternatively, AFCO Manufacturing may install a spray coating line that meets all of the Rule 336.1287(c) conditions:</p> <p>The coating use rate is not more than 200 gallons, as applied, minus water, per month.                      Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.                      Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request.</p> <p>It is not necessary to obtain an air quality permit for spray coating if all of the above conditions are met at all times.</p> <p>It is not necessary to obtain an air quality permit if powder coating processes, with curing oven(s) of course, replace the above coating lines (dip and spray) pursuant to Rule 336.1287(d) provided the powder booth is equipped with appropriately designed and operated particulate control system. Powder coating systems have almost 100 percent transfer efficiency via recycle and reuse of coating powders resulting in practically nil waste of paint.</p>		

During the October 2, 2015, inspection, AFCO Manufacturing was unable to produce emission records, which are required to be kept by PTI No. 376-88, SC 16.

Please initiate actions necessary to correct the cited and submit a written response to this Violation Notice by November 9, 2015 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the occurred; an explanation of the causes and duration of the ; whether the ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

If AFCO Manufacturing believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the cited above and for the cooperation that was extended to me during my inspection of AFCO Manufacturing.. If you have any questions regarding the or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

Iranna Konanahalli

Air Quality Division  
konanahalli@michigan.gov

IK/DC

- cc: Ms. Lynn Fiedler, DEQ
- Ms. Mary Ann Dolehanty, DEQ
- Ms. Teresa Seidel, DEQ
- Mr. Thomas Hess, DEQ
- Mr. Chris Ethridge, DEQ

NAME Iranna Konanahalli DATE 11/09/2015 SUPERVISOR CJE