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

N330872234			
FACILITY: POWDER COTE II		SRN / ID: N3308	
LOCATION: 60 N ROSE ST, MOUNT CLEMENS		DISTRICT: Warren	
CITY: MOUNT CLEMENS		COUNTY: MACOMB	
CONTACT: Charles Trott, Vice President		ACTIVITY DATE: 06/13/2024	
STAFF: Sebastian Kallumkal	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR	
SUBJECT: Scheduled inspection to verify compliance with PTIs and related air quality regulations.			
RESOLVED COMPLAINTS:			

On Thursday, June 13, 2024, I, Sebastian Kallumkal, Michigan Department of Environment, Great Lakes and Energy-Air Quality Division (EGLE-AQD) staff conducted a scheduled inspection of Powder Cote II (SRN N3308) located at 60 N. Rose, Mt. Clemens, Michigan. The purpose of this inspection was to determine the facility's compliance 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 PA 451, as amended (Act 451); the administrative rules; and the conditions of Air Use Permits to Install (PTI) Nos. 571-92, 981-92, 354-97, 425-97, 212-98 and 45-19.

As determined during the previous inspection in 2008, the facility is not a major source of criteria pollutant or hazardous air pollutants.

At the facility (50 N. Rose), I met Mr. Charles Trott, President/Owner. I identified myself, presented Michigan Employee photo identification, and explained the purpose of the inspection.

Powder Cote II operates two powder coating processes, two e-coat lines and four burn-off ovens. Items given an e-coat surface coating may be assembled by the customer directly into the final product without any additional surface coating. Some products require a surface powder coat, which is applied after the part has received its protective anticorrosive e-coat. Some small production runs may only receive a powder coat but surface preparation (e.g. pre-wash or sand blasting) is required for proper powder coat adhesion. The four burn-off ovens were custom fabricated inhouse. These ovens are used to burn-off the powder coating that has built up too thick a coat on the parts racks.

The facility e-coat/powder coat parts supplied by the customers mainly the Ford, GM, and Stellantis. The parts include interior, some exterior, power train, under hood, bumpers, etc.

During the pre-inspection meeting, we discussed facility's operations, and the permit requirements. I inquired him about the Powder Cote II located at 41485 Production Drive. Mt. Clemens, MI (SRN: N0927). He informed me that the facility was operated at this address during 1984-85, but they had to move out of there because the building was sold. Based on the SDS provided, the facility is using non-HAP coatings in both electrocoating processes.

We discussed the permits for the burnoff ovens and the coating lines. The facility is using the PTI 45-19-General Coating permit for the operation of an e-coating line installed in 2019. For the PTI No. 354-97 (Cathodic Electrocoat System), the facility is required to show compliance with VOC emissions in pounds per hour. The facility

keeps VOC emissions in tons per year. We discussed how to calculate the pounds per hour emissions. Later Dave Ehrke, Process Support Manager, indicated that they are keeping records of daily coating usage and the daily hours of operation. Mr. Trott offered to calculate the VOC in Ib/hr starting this day and email the calculations to AQD by the end of June and end of July.

Also, the facility currently has no spray booth for coating parts. Many years ago, the facility conducted very low amount of spray coating as R&D for another source. That project was completed many years ago.

After the pre-inspection meeting, Mr. Ehrke accompanied for an inspection of the facility.

Powder Cote II occupies multiple buildings on N. Rose Street. The permitted processes are located as follows:

50 N. Rose St.: electrocoat (e-coat) process; PTI No. 354-97. Operated 16 hr/5 days

65 N. Rose St.: four burn-off ovens, #348 powder coat line and associated curing oven. Operate 10 hr/5 days

All four burnoff ovens are located in a small, dedicated building (like a concrete shed) behind the 60 N. Rose and 70 N. Rose. PTI Nos. 571-92, 981-92, 425-97 and 212-98. Operates 15 hr/day; 5 days.

70 N. Rose St.: Hi-Lo maintenance and fabrication.

80 N. Rose: powder coat line with associated pre-wash and curing oven. Operates 10 *hr/day*, 5 days.

During the 2008 inspection, the AQD Staff evaluated the facility wide potential to emit to determine if Powder Cote II is subject to Title V (see attached worksheet). The evaluation was based on permit emission limits. When emission limits were not specified in a permit then staff used values from the permit evaluation sheet. Based upon the available information, it appears this facility has the potential to emit less than 4 tons per year of particulate matter and 11.7 tons of VOC. The primary emitter of VOCs is the e-coat system. Per the e-coat MSDS, the e-coat contains a maximum of 2% HAPs, therefore this facility appears to have a maximum individual HAP emission potential of less than 0.25 tons per year. Therefore, this facility does not appear to be subject to Title V.

The facility has not added any processes that could affect this evaluation.

50 N. Rose St.: Electrocoat (e-coat) process; PTI No. 354-97

Initially, we inspected the electrocoating process (batch process) in 50 N. Rose which also houses the office. The E-coating process includes various stages of cleanings (pre-clean, phosphate, sealer), rinses, coatings and dryings. The coating materials includes 2 components (emulsion and paste). Mr. Trott provided me the SDS, technical data sheet and environmental data sheet for these components. The first rinse after the coating in filtered. The solids are recycled to the coating tank and the water is recycled. The second (spray) rinse and the third rinse are also recycled. After the coatings, the parts go through a cure oven and a cooling section. The

process was operating at the time of the inspection. This building also has a wastewater treatment process.

Electro-coating Process:

- 3 wash stages,
- 1 tap water rinse,
- 1 conditioner rinse of titanium dioxide, which is a pretreatment for the phosphate tank,
- 1 nickel-zinc-phosphate dip tank, which is an anti-corrosion coating,
- 2 city water rinses,
- 1 dip tank of Parcolene 50 non-chrome sealer,
- 1 reverse osmosis water rinse,
- 1 empty tank where parts are allowed to drip,
- 1 electro-coat dip tank,
- 2 permeate rinses,
- 1 reverse osmosis water rinse,
- 1 drip pan to allow water to drip off of parts,
- 1 dehydration oven,
- 1 curing oven.

PTI No.: 571-92, 981-92, 425-97 and 212-98 (Burnoff Oven Building)

A separate small building (single room) behind 60 N. Rose and 70 N. Rose houses the 4 burnoff oven and a water spray cooling booth to cool down the hot racks from the burnoff ovens. The water is recycled. Mr. Ehrke informed me that the there is no address assigned for this building. The building is marked "65". He also mentioned that the burnoff ovens are operating at that time. I did not observe any visible emission from the any of the stacks.

Oven 9 (first one on the left side front of the building when facing it) Main Oven temp = 834 °F; After burner: 105 °F, Stack temp: 1463°F

Oven 8 (first one on right side front of the building when facing it) Main Oven temp = 834 °F; After burner: 1224 °F, Stack temp: No digital indicator

Oven 10 (second on right side after Oven 8)

No operating

Oven 11 (second on the left side after Oven 9)

Main Oven temp = 832 °F; After burner: 1182 °F, Stack temp: No digital indicator

Later, during post inspection meeting, I discussed these temp readings with Mr. Trott.

PTI No. 45-19 (60 N. Rose)

Next, we visited the monorail, continuous, e-coating line which are used for smaller parts. This process is covered by PTI No. 65-19. The process includes cleaners (pre, zinc phosphate and sealer), coating and various rinses, and cure oven.

This building also has a shot (steel) blaster to clean some of the parts before coating. The shots are recycled, and exhaust is vented into the general in-plant area. This process is exempt from permit to install (R336.1201) requirements pursuant to Rule 285(2)(I)(vi)(B), which states in part:

R 336.1285 Permit to install exemptions; miscellaneous.

Rule 285. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(*I*) The following equipment and any exhaust system or collector exclusively serving the equipment:

(vi) Equipment for carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, sand blast cleaning, shot blasting, shot peening, or polishing ceramic artwork, leather, metals, graphite, plastics, concrete, rubber, paper board, wood, wood products, stone, glass, fiberglass, or fabric which meets any of the following:

(A) Equipment used on a nonproduction basis.

(B) Equipment that has emissions that are released only into the general in-plant environment.

This building also has a powder coating line. The process includes the pre-wash, dehydration, powder coat line and associated curing oven. The process was in operation at the time of the inspection. Surface preparation of parts must be performed prior to powder coating. Customers can provide pre-treated parts or Powder Cote II can pre-treat the parts by processing the parts through a pre-wash system. The pre-wash consists of the following steps:

- Alkaline cleaner,
- Tap water rinse,
- · Zinc phosphate,
- Tap water rinse,
- · Non-chrome seal,
- Dehydration oven.

The pre-wash appears to be exempt from R201 per R285(2)(r) which states in part:

R 336.1285 Permit to install exemptions; miscellaneous.

Rule 285. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(r) Equipment used for any of the following metal treatment processes if the process emissions are only released into the general in-plant environment:

- (i) Surface treatment.
- (ii) Pickling.
- (iii) Acid dipping.
- (iv) Cleaning.
- (v) Etching.
- (vi) Electropolishing.

(vii) Electrolytic stripping or electrolytic plating.

The bag filters associated with the powder coat process appeared to be installed and

properly maintained. I did not observe any powder on the floor. Powder coating process appears to be exempt from permit to install (R336.1201) requirements pursuant to Rule 287 (2)(d) which states in part:

R 336.1287 Permit to install exemptions; surface coating equipment.

Rule 287. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(d) A powder coating booth and associated ovens, where the booth is equipped with fabric filter control. The fabric filter control shall be installed, maintained, and operated in accordance with the manufacturer's specifications, or the owner or operator shall develop a plan that provides to the extent practicable for the maintenance and operation of the equipment in a manner consistent with good air pollution control practices for minimizing emissions.

Hi-lo Maintenance and Fabrication Building (70 N. Rose)

We did not visit this building because it does not have air quality related processes in this building.

80 N. Rose-Powder Coating Line

Next, we visited 80 N. Rose building. This building houses a powder coating line. This coating line is new, installed in 2022 and is more efficient than the previous one.

The powder coating process includes pretreatment wash (pre-cleaner, zinc phos, nonchrome sealer, rinses, dehydration, powder coating and cure oven. The powder is recycled. As mentioned above, the pre-wash and powder coating is exempt from permit to install requirements.

At the end of my visits to the various buildings, I inquired Dave if the facility has any cold cleaners or emergency generators. He informed me that they have a solvent based cold cleaner in the maintenance area (80 N. Rose) and two emergency generators which are located in 50 N. Rose building and 60 N. Rose building. These emergency generators are needed to power the recycling the e-coat process. Both of these are emergency generators are natural gas fired. 50 N. Rose emergency generator was installed around 1997. We visited this generator. The emergency generator in 60 N. Rose building was installed in 2019. We did not visit this emergency generator. This generator is used for the whole building and the E-Coat line.

We also visited the cold cleaner (cold washer) which is located in 80 N. Rose building. The lid was covered at the time of inspection. I informed him about the operational procedure for the cold cleaner.

Solvent based cold cleaners are exempt from R336.1201-Permit to Install requirements pursuant to Rule 281(2)(h) which states in part:

R 336.1281 Permit to install exemptions; cleaning, washing, and drying equipment. *Rule* 281. (1) This rule does not apply if prohibited by *R* 336.1278 and unless the requirements of *R* 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(h) Cold cleaners that have an air/vapor interface of not more than 10 square feet.

The cold cleaners are subject to the requirements of R336.1611 (existing-installed before July 1, 1970) or R336.1707 (New, Installed on or after July 1, 1979). I provided Mr. Trott the operational procedure to be posted near the cold cleaner to comply with Rule 611(6) and 707 (4).

The emergency generators are exempt from permit to install requirements pursuant to R 336.1285(2)(g) which states in part:

R 336.1285 Permit to install exemptions; miscellaneous.

Rule 285. (1) This rule does not apply if prohibited by R 336.1278 and unless the requirements of R 336.1278a have been met.

(2) The requirement of R 336.1201(1) to obtain a permit to install does not apply to any of the following:

(g) Internal combustion engines that have less than 10,000,000 Btu/hour maximum heat input.

However, these emergency generators, Reciprocating Internal Combustion Engines (RICE) are subject to Federal requirements such as 40 CFR 63, Subpart ZZZ-National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines and 40 CFR 60, Subpart JJJJ- Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The applicability is based on the manufacture date and the installation date.

40 CFR 63.6590(c)-Stationary RICE subject to Regulations under <u>40 CFR Part 60</u>. An affected source that meets any of the criteria in <u>paragraphs (c)(1)</u> through (7) of this section must meet the requirements of this part by meeting the requirements of <u>40 CFR part 60 subpart IIII</u>, for compression ignition engines or <u>40 CFR part 60 subpart JJJJ</u>, for spark ignition engines. No further requirements apply for such engines under this part.

(1) A new or reconstructed stationary RICE located at an area source.

Powder Cote II is an area source for hazardous air pollutant emissions and the emergency engine installed in 2019 is a new source. This emergency generator is subject to 40 CFR Part 60, Subpart JJJJ and therefore, pursuant to 40 CFR 63.6590(c)(1), complying with 40 CFR 60, Subpart JJJJ would suffice the compliance with 40 CFR Part 63, Subpart ZZZZ.

The emergency generator installed in 1997 for 50 N. Rose building is an existing source and needs to comply with the requirements of 40 CFR 63, Subpart ZZZZ. In an email dated June 21, 2024, Mr. Trott provided following information regarding this generator.

After the site visit, I had a post inspection meeting with Mr. Trott. He provided me the VOC calculations and SDS for the coatings. He offered to email me the temperature logs for the burnoff ovens.

I informed him that the monitors for Burnoff oven afterburner temperature were not reading properly. I suggested that he replace/repair the monitors and send me its photographs. He told me that he can do it by June 30th. I also informed him that I inspected the cold cleaner and two emergency generators. I provided him the cold cleaner operating procedure as required by Rule 611/707 to be posted nearby the cold cleaner. I inquired him about the Certificate of Conformity and maintenance records for the 2019 installed emergency generator (subject to NSPS 40 CFR 60, Subpart JJJJ and 40 CFR 63, Subpart ZZZZ) and maintenance records for the 1997 installed emergency generator (subject to 40 CFR 63, Subpart ZZZZ). He told me he

can obtain the records for the 2019 generator from the contractor but has not been doing any maintenance for the 1997 generator.

I requested the following information from Powder Cote II in an email in a June 14, 2024.

- Correct the temp monitors for the burnoff oven by June 30th and email photos of the new installations to AQD
- 2. Provide hourly VOC emission calculations for PTI 354-17
- 3. Provided to him the EGLE created operational procedure pursuant R611/707 for cold cleaners
- 4. Provide SDS for the cold cleaner solvent
- 5. Provide installation date and manufacture date for both emergency generators
- 6. Current hours and hours operated last two years
- 7. EPA Certificate of Conformance for the 2019 Emergency Generator
- 8. Maintenance for both generators
- 9. Rating for both generators

Compliance Evaluation

PTI 354-97 – Electrocoating Process at 50 N. Rose St.

SC 13- Volatile Organic Compound (VOC) emissions from the e-coat process (Cathodic Electrocoat System) is limited to 3.25 pound per hour and 11.7 tons per calendar year based upon a 12-month rolling period as determined at the end of each calendar month.

Mr. Trott provided emissions reports for January 2019 through May 2024. The records include monthly usage, for both components, emulsion and paste (BASF U32CD525 and BASF U32KD526), VOC content of both components, total monthly VOC emissions and calendar year VOC emissions.

Year	Total Usage (gallons)	Total VOC emissions (pounds)
2019	69,982	12,638
2020	44,817	8,000
2021	39,308	6,917
2022	35,348	6,269
2023	38,960	7,067
2024 (Jan-May)	20,611	3,684

Powder Cote II was not able to provide VOC emission calculations in lb/hr to show compliance with the lb/hr limit. As mentioned before, the facility agreed to calculate the hourly starting June and send to AQD for verification.

SC 14 limits the VOC emission rate from the electrocoating portion of the Cathodic Electrocoat system not to exceed 0.2 pound per gallon of coating (minus water) as applied. The analysis from BASF, the supplier, shows that VOC per gallon less water for the electrocoat bath U32KD525R, is 0.56. This is a violation of this requirement. A violation notice would be sent for this violation.

SC 15 -requires VOC emission rate verification, by testing, if required by AQD. AQD has not required testing.

SC 16 limits the opacity of visible emissions from the e-coat process to less than 20%. The coating process was operating at the time we were outside the building. I did not observe any visible emissions from the e-coat process.

SC 17-requires the permittee to calculate the VOC emission rates from the e-coat process for each calendar day, using the method detailed in Appendix A or a method acceptable to District Supervisor. This requirement is for the calculation of VOC content of the coating bath. The facility could make this calculation because they are recording the daily usage of the coating. For the e-coat bath, the facility uses the same coating and formulation every day. Therefore, calculation of VOC emission rates on a daily basis does not appear to serve any significant purpose. So, compliance with this requirement was not verified.

SC 18-The e-coating is recycled. Any spills are cleaned and stored in closed containers. The waste collection system for the e-coat line appeared to demonstrate compliance with this requirement.

SC 19 and 20: Exhaust stacks dimensions were not verified but appeared to comply with the dimensional parameters.

PTI Nos. 571-92, 981-92, 425-97 and 212-98 - in a Building behind 60 N. Rose St.

All four burn-off ovens are located in one dedicated building at the east end of the lot behind 60 N. Rose. These four permits were issued for burn-off ovens that were custom fabricated by Powder Cote II. The special conditions vary from permit to permit and this is assumed to have occurred based upon the year the burn-off oven was manufactured and the knowledge available at the time the permit was written.

Oven 8-PTI No. 571-92

SC 15 requires the afterburner temperature be maintained at a minimum of 1500 degrees F and that operating records shall be kept on file for a period of at least two years.

SC 16-limits stack exhaust to no visible emissions- I did not observe any visible emissions.

Oven 9-PTI No. 981-92

SC 15-limits stack exhaust to no visible emissions- I did not observe any visible emissions.

SC 16: Exhaust stacks dimensions were not verified but appeared to comply with the dimensional parameters.

SC 17 and 18 requires the afterburner temperature be maintained at a minimum of 1500 degrees F and a minimum retention time of 0.5 seconds and that operating records shall be kept on file for a period of at least two years.

Oven 10-PTI No. 425-97

SC 13 and SC 14-limits particulate emissions to 0.10 pounds per 1000 pounds of exhaust gases, corrected to 50% oxygen, and no visible emissions (VE) from the stack, respectively. I did not observe any VE from the stack. The process appears to be in compliance with the PM limit due to absence of any VE. The compliance with PM emission limit was not verified (See comments to SC 18).

SC 15 requires the afterburner temperature be maintained at a minimum of 1400 degrees F and a minimum retention time of 0.5 seconds.

SC 16 required the installation of a thermocouple in the afterburner portion and continuous recording of the temperature and that continuous operating records shall be kept on file for a period of at least two years. The afterburner appears to have a thermocouple to monitor the temperature. Mr. Trott informed me that they are recording the temperature continuously.

SC 17 – requires the disposal of collected ash in a manner which minimizes the introduction of air contaminants to the outer air. The floor appeared clean at the time of the inspection, and I did not observe any open ash containers.

SC 18-requries the verification of particulate emission rate from the process by testing, if required by AQD. This verification has not been required by AQD. Compliance with the PM limit in SC 13 is by testing. Therefore, compliance has not been verified.

SC 19: Exhaust stacks dimensions were not verified but appeared to comply with the dimensional parameters.

Oven 11- PTI No. 212-98

SC 1-limits particulate emissions to 0.10 pounds per 1000 pounds of exhaust gases, corrected to 50% oxygen. I did not observe any VE from the stack. The process appears to be in compliance with the PM limit due to absence of any VE. The compliance with PM emission limit was not verified (See comments to SC 6).

SC 2- requires the afterburner temperature be maintained at a minimum of 1400 degrees F and a minimum retention time of 0.5 seconds. In contrast to the special conditions in the above three permits, SC No. 3 states, "The applicant shall not operate the burn-off oven unless an interlock on the afterburner is installed and operating properly." The burn-off oven operating under PTI No. 212-98 appears to be in compliance.

SC 4 – requires the disposal of collected ash in a manner which minimizes the introduction of air contaminants to the outer air. The floor appeared clean at the time of the inspection, and I did not observe any open ash containers.

SC 5: Exhaust stacks dimensions were not verified but appeared to comply with the dimensional parameters.

SC 6-requries the verification of particulate emission rate from the process by testing, if required by AQD. This verification has not been required by AQD. Compliance with the PM limit in SC 13 is by testing. Therefore, compliance has not been verified.

During the inspection following data was observed.

PTI No. 981-92-Oven 9 (first one on the left side front of the building when facing it)

After Burner Temp Limit = 1500 degrees F

Main Oven temp = 834 °F; After burner: 105 °F, Stack temp: 1463°F

PTI 571-92-Oven 8 (first one on right side front of the building when facing it)

After Burner Temp Limit = 1500 degrees F

Main Oven temp = 834 °F; After burner: 1224 °F, Stack temp: No digital indicator

PTI 425-97- Oven 10 (second on right side after Oven 8)

After Burner Temp Limit = minimum of 1400 degrees F

No operating

PTI 212-98 - Oven 11 (second on the left side after Oven 9)

After Burner Temp Limit = minimum of 1400 degrees F

Main Oven temp = 832 °F; After burner: 1182 °F, Stack temp: No digital indicator

As observed on this day, all three ovens were operating with the afterburner below the minimum required temperature. This is a violation of the related special conditions and would be included in a violation notice. As mentioned earlier, Oven 10 was not operating on that day. The temperature monitor for the Oven #9 does not appear to be properly maintained as it reads 105°F and stack temp 1463°F. The facility needs to properly install all these monitors.

On July 11, 2024, Mike Coon from Powder Cote II, sent me afterburner temp data for all ovens for 1 day/week for a few weeks in 2023 and 2024. The records show that during these days, Oven 10 afterburner was operating below the required temp and Oven 11 temperature monitor was malfunctioning.

Oven 8 afterburner malfunctioned on 12/13/2023, 2/14/2024, 5/8/2024.

Oven 9 afterburner operated below the minimum temperature for several hours on 3/13/2024, 4/10/2024, 6/9/2024, 6/11/2024, 6/12/2024, 6/13/2024, 6/14/2024.

General Permit to Install No. 45-19, e-coat system – Located in 60 N. Rose

FG-COATING

I.1 and 2 limits the VOC emissions to 2000 lb/month and 10 tpy for each coating line.

Mr. Trott provided emissions reports for December 2019 through May 2024. The records include monthly usage, for both components, emulsion and paste (BASF U32CD525 and BASF U32KD526), VOC content of both components, monthly VOC emissions and calendar year VOC emissions.

Year	Total Usage (gallons)	Total VOC emissions (pounds)
2019 (December only)	899	163
2020	8,205	1,486
2021	11,612	2,107
2022	12,634	2,289
2023	19,559	3,543
2024 (Jan-May)	8,481	1505

The submitted reports show that none of the months had VOC emissions more than 2000 pounds.

The coatings are recycled, and any spills are cleaned. The waste collection system for the e-coat line appeared to demonstrate compliance with this requirement.

The e-coating process is an emersion coating; therefore, the spray applicators are not used. Hence, no particulate control (dry filters or water curtain) needs to be used. The facility is not using any type of VOC controls. The VOC analysis of the coatings, as applied, was not required. The facility is keeping records of the coatings (2 parts, emulsion and paste) usage. No organic solvents are used. The facility is calculating and keeping records of the monthly and annual VOC emissions. The facility is keeping records of the chemical composition of the coatings. Exhaust stacks dimensions were not verified but appeared to comply with the dimensional parameters. The facility has not had any modifications to the process.

FG-SOURCE

I.1 limits the VOC emissions to less than 30 tons per year. Based on the submitted calculations, the VOC emissions from the coating processes are less than this limit. The facility is keeping records of the VOC calculations.

Cold Cleaners (Cold Washers):

Mr. Trott sent me SDS for the cold cleaners (Cold Washers) on June 18, 2024. The SDS for ZEP DYNA 170 (Liquid Parts Cleaner) shows that the product contains no VOC. In an email dated June 26, 2024, Mr. Trott indicated that they have two cold cleaner (cold washer) including one in Hi-Lo maintenance area. He sent me pictures of both cold cleaners with the operational procedures posted.

Emergency Engines:

The facility has two emergency Reciprocating Internal Combustion Engines; one located in 50 N. Rose and another one located in 60 N. Rose.

Powder Cote II is an area source for hazardous air pollutant emissions and the emergency engine, installed in 2019 at 60 N. Rose, is a new source pursuant to 40 CFR 63, Subpart ZZZZ. This emergency generator is subject to 40 CFR Part 60, Subpart JJJJ and therefore, pursuant to 40 CFR 63.6590(c)(1), complying with 40 CFR 60, Subpart JJJJ would suffice the compliance with 40 CFR Part 63, Subpart ZZZZ.

The emergency generator installed in 1997 at 50 N. Rose building is an existing source according to 40 CFR 63, Subpart ZZZZ and needs to comply with the requirements of 40 CFR 63, Subpart ZZZZ. In an email dated June 21, 2024, Mr. Trott provided following information regarding this generator.

Here is the information for standby generator in building 50.

Manufacture: Onan Corporation

Model number: 70.0 KR-15R/9413U

Serial number: 1780359424

Size: 70 KW

Date of manufacture: 7/21/1978

Hours on generator: 234

The facility needs to conduct the required maintenance to comply with the requirements of 40 CFR 63, Subpart ZZZZ.

In an email dated June 18, 2024, Mr. Trott provided details and maintenance records for the 2019 RICE located at 60 N. Rose. (below)

Here is the information for the 2019 Generator at 60 N Rose.

It does a weekly 20 minute exercise cycle. So that accounts for 17.33 hours a year, plus 2 hours during the annual PM.

Both of these generators only run in the event of a power outage to circulate the paint tank so it does not go bad.

We are working on getting the information on the generator at Building 50, as well as changing the oil and spark plugs.

Based on the information provided by Trisha Jarvis, Service Coordinator Supervisor, Wolverine Power Systems, which maintains this RICE, the installation was completed on January 30, 2020. Trisha sent me the EPA Certificate of Conformity for this RICE on July 12, 2024. I forwarded a copy to Mr. Trott for his file. The facility is conducting annual maintenance Wolverine Power. This RICE appears to be compliance with 40 CFR 60, Subpart JJJJ-NSPS for Spark Ignition RICE.

This RICE is a Generac, 50 KW (50 KW, Model SG50, SN: 3004595466; 100 AMP; Model No. GTS010W-3J2LDNAN; SN:3004539694)), natural gas fired emergency engine.

Unit hours on 2/6/2024 (maintenance date) = 57.7

The facility provided maintenance records for 2023 and 2024.

CONCLUSION

Powder Cote II appears to be in violation of the PTI No. PTI Nos. 571-92, 981-92, 425-97, 212-98 and 354-97 as discussed above. A notice of violation was sent to the facility on July 12, 2024, to the facility to correct these violations.

NAME Sebastionykallemkal DATE 07-12-2024 SUPERVISOR Joyce