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

N526672470

FACILITY: NOR COTE, INC.		**SRN / ID:** N5266
LOCATION: 11425 TIMKEN, WARREN		**DISTRICT:** Warren
CITY: WARREN		**COUNTY:** MACOMB
CONTACT: Cecil Black , President		**ACTIVITY DATE:** 06/25/2024
STAFF: Owen Pierce	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** SM OPT OUT
SUBJECT: FY 24 Inspection Report		
RESOLVED COMPLAINTS:		

On June 25, 2024, I (Owen Pierce EGLE - Air Quality Division) performed a scheduled targeted inspection of Nor-Cote, Inc. located at 11425 Timken Ave, Warren, Michigan. The purpose of the inspection was to determine the facility's compliance with the Federal Clean Air Act; and Article II, Part 55, Air Pollution Control of Natural Resources and Environmental Protection Act, 1994 Public Act 451 and the conditions of Permit to Install (PTI) No. 350-94B and No. 97-06. Upon arrival, I met with Cecil Black, President, and conducted a pre-inspection meeting where I introduced myself, presented my credentials, and stated the purpose of the inspection.

During the pre-inspection meeting, Cecil explained the facility's processes and equipment. Nor-Cote is a steel and aluminum heat treating company. The facility operates multiple furnaces, which range in size, to handle the varying sizes of metal products being heat treated. Nor-Cote, is permitted to operate four grit blasting units which are used to smooth the metal surfaces following the annealing process. The four units are controlled by a dust collector. Three of the four grit blasters are automatic units, and one of the four grit blasters is a manual unit. The facility also has two spray booths that are covered under the facility's general permit-to-install.

The facility has approximately 30 employees and normally operates 3 shifts a day for 24 hours a day, five days a week, depending on their work demand. According to Cecil, there have been no recent process or equipment changes. According to Cecil, there are no boilers, generators, or cold cleaners at the facility. Following the pre-inspection meeting, Cecil lead me on an inspection of the facility.

Facility Walk-through Observations

During the facility walk-through, I observed the four permitted grit blasting units (EUBLASTING1, EUBLASTING2, EUBLASTING3, AND EUBLASTING4). The manual grit blasting unit was in operation and the 3 automatic grit blasting units were not in operation.

We went outside to observe the dust collector associated with the grit blasting operations. I did not observe any visible emissions coming from the dust collector or the stack. I observed that the area around the dust collector was clean and there was not any fugitive dust or fallout in the area. Cecil explained that the collected dust is regularly discharged into bins that are then sealed until being hauled off for disposal. I observed that there were sealed bins being stored near the dust collector. Cecil explained that the filters in the dust collector are changed approximately once a year.

Following grit blasting, parts may then be coated, depending on customer specification. The facility has two spray coating booths, and I observed that one of the two spray booths is in service while the other is no longer in use. The spray booth in service was not in operation during the inspection as the filters were being replaced. According to Cecil, coating operations have decreased as many customers apply their own coatings to the final products and therefore do not require Nor-Cote to pre-coat the metal parts.

Heat Treating Furnaces

In addition to the permitted equipment, I observed approximately 7 heat treating furnaces of varying sizes that use natural gas as a source of fuel. The furnaces are exempt from the requirement to obtain a permit to install per R336.1282(2)(a)(i) because they fire sweet gas fuel (natural gas) and are furnaces

for heat treating metals, the use of that does not involve ammonia, molten materials, oil-coated parts, or oil quenching.

PTI No. 350-94B & 97-06 Compliance Evaluation

The facility was issued General PTI No. 97-06 for one or more coating lines and all associated purge and clean-up operations, and PTI No. 350-94B for four grit blasting units. Recordkeeping requirements from January 2020 through June 2024 were submitted to me via email from Michael Iacopelli, Environmental Consultant with Advanced Engineering Solutions. Records can be located internally at the following link: S:\Air Quality Division\STAFF\Owen Pierce\FY 24\Nor-Cote, Inc.

FG-COATING (PTI No.97-06)

Special condition (SC) I.1 sets the VOC emission limit at 2,000 pounds per month (lbs/month) and SC I.2 sets the VOC emission limit at 10 tons per year (tpy) based off a 12-month rolling time period as determined at the end of each calendar month. In order to comply with these emission limits, SC VI.3 states that the permittee shall keep track of the following information:

- Purchase orders and invoices for all coatings, reducers, and purge/clean-up solvents
- VOC content, in pounds per gallon, of each coating, reducer and purge/clean-up solvent used.
- Gallons of each coating, reducer and purge/clean-up solvent used and reclaimed.
- VOC mass emission calculations determining the monthly emission rate for each coating line, in tons per calendar month, using the method specified in Appendix B.
- VOC mass emission calculations determining the annual emission rate for each coating line, in tons per 12-month rolling time period as determined at the end of each calendar month, using the method in Appendix B.

According to the submitted records, VOC emissions were below the 2,000 lbs/month and 10 tpy emission limits for all months from January 2020 - June 2024. The highest monthly VOC emissions recorded were 1,421lbs/month in August 2023 and the highest 12 month rolling VOC emissions recorded were 4.87 tpy as recorded at the end of March 2024.

SC IV.4 states that the permittee shall not operate any spray application unless particulate control (dry filters or a water curtain) is installed, maintained, and operated in a satisfactory manner. I observed that the spray booth had filters in place, and during the inspection, the filters were in the process of being changed. Cecil Black explained that the filters are changed when they are observed as being covered with coating.

SC VI.4 states that the permittee shall maintain a current listing from the manufacturer of the chemical composition of each coating, including the weight percent of each component. The data may consist of material safety data sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. During the inspection, I reviewed the material safety data sheets for the gray and white coatings that are used at the facility.

FG-SOURCE (PTI No.97-06)

Special condition (SC) I.1 sets the source-wide VOC emission limit at 30 tpy based off a 12-month rolling time period as determined at the end of each calendar month. In order to comply with this emission limit, SC VI.1 states that the permittee shall keep source-wide VOC mass emission calculations, on a monthly basis for FG-SOURCE determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month, for all coating lines and associated purge and clean-up operation at the source.

According to the submitted records, VOC emissions were below the 30 tpy emission limits for all months from January 2020 - June 2024. The highest 12 month rolling VOC emissions recorded were 4.87 tpy as recorded at the end of March 2024.

FGBLASTING (PTI No.350-94B)

SC I.1 through I.3 sets particulate matter (PM) emission limits and visible emissions limits for the four grit blasting units. Compliance with these emission limits is based on SC IV.1 which states that the permittee shall not operate any grit blasting emission unit within FGBLASTING unless its associated dust collector is installed, maintained, and operated in a satisfactory manner. During the facility walk-through, I observed that the dust collector associated with the four grit blasting units was installed, maintained, and operating in a satisfactory manner.

In addition, the PM emission limits listed in the permit may be tested and monitored according to the requirements in general condition (GC) 13 which states that the Department may require the permittee to conduct acceptable performance tests at the permittee's expense in accordance with R 336.2001 and R 336.2003, under any of the conditions listed in R 336.2001. As of the date of this report, the Department has not required performance testing from the facility.

FGFACILITY (PTI No. 350-94B)

SC I.1 sets the individual HAP emission limit at 8.9 tpy and SC I.2 sets the aggregate HAP emission limit at 22.0 tpy, and both emission limits are based off a 12-month rolling time period as determined at the end of each calendar month. In order to comply with these emission limits, SC VI.2 states that the permittee shall keep records on a monthly basis of the gallons of each HAP material used, the HAP content, in pound per gallon or pounds per pound, of each HAP containing material used, Individual and Aggregate HAP emissions calculations per month, and 12-month rolling Individual and Aggregate HAP emissions calculations as determined at the end of each month.

The highest 12-month rolling individual HAP emissions calculated from January 2020 through June 2024 was Xylene at 1.817 tpy as recorded at the end of January 2020. The highest 12-month rolling aggregate HAP emissions calculated from January 2020 through June 2024 were 3.0342 tpy as recorded at the end of January 2020.

Conclusion

Based on the information obtained during the inspection and a review of the requested records, Nor-Cote Inc. is in compliance with the conditions and requirements in PTI No. 350-94B and PTI No. 97-06.

NAME Owen Pierce DATE 7/26/2024 SUPERVISOR K. Kelly