

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

P098252711

FACILITY: Central Conveyor		SRN / ID: P0982
LOCATION: 52800 Pontiac Trail, WIXOM		DISTRICT: Warren
CITY: WIXOM		COUNTY: OAKLAND
CONTACT: Kevin Estes , Chief Operating Officer		ACTIVITY DATE: 11/21/2019
STAFF: Iranna Konanahalli	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Synthetic Minor
SUBJECT: FY2019 MACT 4M Synthetic Minor CMS scheduled inspection of Central Conveyor Company ("Central" or "3C" or "the company")		
RESOLVED COMPLAINTS:		

Central Conveyor Company (P0982)

52800 Pontiac Trail
Wixom, MI 48393

VN: AQD issued Violation Notice (VN) dated December 07, 2018, for Rule 336.1201 (structural parts paint spray booth using only solvent based paints) and 336.1910 (the booth filters not installed properly, gaps and holes were present). AQD received December 21 VN response letter from Kevin Estes.

Active PTI: MACT opt-out PTI No. 26-19A dated December 20, 2019, for structural steel paint spray booth revising most recent PTI No. 26-19 to increase emission limit for existing paint booth EU-PAINTBOOTH and incorporate 44-foot stack to help in dispersion modelling.

PTI void: PTI No. 26-19 dated March 20, 2019, for structural steel paint spray booth (Received: 02/06/2019; Approved: 03/20/2019; Voided: 12/20/2019)

PTI Mod: PTI No. 26-19 → PTI No. 26-19A dated December 20, 2019. AQD updated the stacks information (from no stack to 44-foot stack) as such stack info was not included in the prior PTI application (# 26-19). AQD removed FG-METALPARTS with Rule 336.1621(10)(b) exemption limits (FG-METALPARTS, I.1 limit: less than 30.0 tpy of VOC) and increased emission limit for existing paint booth EU-PAINTBOOTH (PTI No. 26-19, EU-PAINTBOOTH, I.1&2 limits: 2000 lb/month & 10 tpy of VOC → PTI No. 26-19A, EU-PAINTBOOTH, I.1&2 limits: 25.0 tpy of VOC, tert-butyl acetate (TBA, CAS# 540-88-5), acetone (CAS# 67-64-1), and p-chlorobenzotrifluoride (PCBT, CAS# 98-56-6), combined & 3.5 pounds of VOC per gallon of coatings [minus water & exempt solvents], as applied).

Not Subject to: NESHAP/ MACT T, National Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T; NESHAP/ MACT T); Correction; 29484 Federal Register / Vol. 60, No. 107 / Monday, June 5, 1995 / Rules and Regulations; amended National Air Emission Standards for Hazardous Air Pollutants: Halogenated Solvent Cleaning (40 CFR, Part 63, Subpart T); Final Rule; Page 25138 Federal Register / Vol. 72, No. 85 / Thursday, May 3, 2007 / Rules and Regulations.

MACT 4M Synthetic Minor: PTI No. 26-19A, FGFACILITY, I.1-4 limits (tpy): 8.9 Single HAP, 22.4 Aggregate HAPs, 8.9 Ethylbenzene (CAS# 100-41-4) and 1.5 Naphthalene (CAS# 91-20-3) tons per year.

Not subject to (Synthetic Minor PTI No. 26-19A): NESHAP / MACT MMMM (4M), National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, Page130, Federal Register / Vol. 69, No. 1 / Friday, January 2, 2004 / Rules and Regulations / Final rule.

On November 21, 2019, I conducted a level-2 **FY2019 MACT 4M Synthetic Minor CMS scheduled inspection** of Central Conveyor Company (“Central” or “3C” or “the company”), located at 52800 Pontiac Trail, Wixom, MI 48393. 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 Environment, Great Lakes & Energy, Air Quality Division (EGLE-AQD) administrative rules.

During the FY 2020 inspection, Mr. Bruce Mazurowski (Phone: 248-446-0118-ext. 193; Fax: NA; Cell: 313-938-2488; E-mail: bMazurowski@CentralConveyor.com), Manufacturing Manager, assisted me.

About February 2018, Mr. Kevin Estes, Chief Operating Officer, separated as soon as US Tsubaki Holdings bought Central.

The purpose of inspection was to follow up on the most recent violation notice (December 07, 2018). Also, 3C is scheduled for FY 2020 inspection.

Founded in 1993, Central Conveyor designs and builds customized material handling & conveyance systems for principally automotive industry. Central is privately owned with about 150 employees including 50 engineers. About June 2018, Tsubaki (2 billion dollars in sales) acquired Central and its five subsidiaries via US Tsubaki Holdings, Inc., a wholly owned subsidiary of Tsubakimoto Chain Company, for 140 million dollars. New State Capital Partners, LLC, a private equity firm, sold Central to Tsubaki. Tsubakimoto is a manufacturer of power transmission products and material handling systems. Central moved to Wixom about April 2016.

Misc. Activities

Miscellaneous metal cutting, grinding, welding activities take place in the plant with in-plant exhaust. Mostly MIG (Metal Inert Gas) welding (rarely arc welding that uses flux core), shear & plasma cutting, etc. are performed. No dedicated exhaust to outside ambient air.

Fifteen (15) welding machines are present. Acetylene cutting is performed. Plasma cutting is performed on a downdraft table equipped with downdraft capture system and filter system. All exhaust is released to in-plant environment. The entire plant is equipped with two exhaust fans on south side and two filter-less louvers for intake air on north side to balance air.

The welding machines are exempt from Rule 336.1201 (Permit-to-Install) pursuant to Rule 336.1285(2)(i) (brazing, soldering, welding, plasma-cutting)). This exemption does not require emission controls.

Acetylene

Acetylene (C₂H₂ CAS # 74-86-2 with carbon-to-carbon triple bonds; VP = 44 atm. at 20 °C) and oxygen (O₂) mixture is used in welding operation to obtain highest flame temperature (adiabatic flame temperature = 2,534 °C = 4,593 °F with stoichiometric air & adiabatic flame temperature = 3,480 °C = 6,296 °F with stoichiometric oxygen). Use of oxygen instead of air avoids quenching effect of atmospheric nitrogen (air ≈ 79 %v N₂ + 21 %v O₂).

40 ft W * 14 ft D * 12 ft H Spray Booth.

One Spray Booth Products of Redford, Michigan, paint spray booth (40 ft. Width x 14 ft. Depth x 12 ft. Height, 26000 cfm fan, stack height H_s = 44 ft., building height H_b = 32 ft.) equipped with a back-draft dry filter system is present. The back-draft filter system, for overspray particulate control, consists of numerous filter panels. During the December 05, 2018, inspection, I observed that the dry filters were not installed properly. There were lots of holes and gaps in the filter system. As coatings usage was greater than 200 gallons per month, AQD issued December 2018 Violation Notice (VN) for Rules 201(Permit-to-Install) and 910 (gaps & holes in filter system) . Central uses only solvent-based coatings: primer (PC) and basecoat (BC); no clearcoat (CC) coatings at all.

I asked Mr. Mazurowski to install the filters such that they fit, at all times, snugly without gaps and holes. Duct / painter's tape may be used to cover the gaps.

PTI No. 26-18 dated March 20, 2019

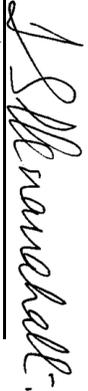
As a result of December 2018 Violation Notice (VN), Central obtained PTI No. 26-18. As result of VOC limits of 200 pounds per month and 10 tons per year for only one existing booth, Central was **not** subject to RACT Rule 621. Central quickly revised this permit to include the existing 44-foot stack and to increase VOC emissions. The permits (# 26-18 & # 26-18A) also exempt Central from NESHAP / MACT 4M. The permit (PTI No. 26-18) was obtained as AQD issued VN subsequent to an audit (environmental audit dated October 23, 2018) by US Compliance Corporation of Excelsior, MN 5531. Mr. Matt Warstler, Project Manager, Central Conveyor, sent an e-mail dated November 26, 2018, 12:58 pm, to Joyce Zhu with questions about the audit.

Central used 11-145 (max. usage is for July 2019) gallons per month, for Jan thru Oct 2019 months, emitting 1.3 tons of VOC per the 10-month period (PTI No. 26-19, EU-PAINTBOOTH, 1.1&2 limits: 2000 pounds per month & 10 tpy of VOC and FG-METALPARTS, 1.1 limit: 30 tpy VOC). Also, Central emitted 1.5 tons of HAPs per the 10-month period (PTI No. 26-19, FGFACILITY, 1.1-3 limits (tpy): 8.9 Single HAP, 22.4 Aggregate HAPs & 0.9 Ethylbenzene (CAS# 100-41-4)).

AQD will conduct a follow-up inspection of Central when the recordkeeping spreadsheet is revised per revised permit (PTI No. 26-19A: increased VOC emissions and subject to RACT Rule 621) and populated with data. The MS Excel spreadsheet must be scrutinized by Central since HAP emissions are slightly higher than VOC unless exempt solvents are involved.

Conclusion

AQD issued December 07, 2018, Violation Notice for Rules 201 and 910. As a result of VN Central obtain the permit. Repeat inspection is necessary as Central revised the permit to increase VOC emissions.

NAME 

DATE December 30, 2020 SUPERVISOR 