

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

A942629002

FACILITY: PRO WELD INC		SRN / ID: A9426
LOCATION: 50625 RICHARD W BLVD, CHESTERFIELD		DISTRICT: Southeast Michigan
CITY: CHESTERFIELD		COUNTY: MACOMB
CONTACT: Scott Light , President		ACTIVITY DATE: 03/16/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Level 2 Target Inspection		
RESOLVED COMPLAINTS:		

On March 16, 2015, AQD staff Kerry Kelly and I conducted an unannounced level 2 target inspection at Pro Weld, Inc. The facility is located at 50625 Richard W Blvd, Chesterfield, Michigan 48051. 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), the administrative rules, and the facility's Permit to Install No. 96-09. During the pre-inspection meeting, I initially showed my credential (ID Badge), stated the purpose of my visit, and gave a copy of the pamphlet "Environmental Inspections: Rights and Responsibilities" to Ms. Dawn Korczak. Ms. Dawn Korczak, Administrative Assistant, is the facility contact for recordkeeping. Mr. Scott Light is the company President but decided not to sit with us during the pre-inspection meeting. Mr. Ken Thompson, Maintenance Supervisor, accompanied us during the walk through inspection.

The facility manufactures metal racks primarily for the automotive industry. Currently, the facility's major customers are Ford, General Motors, and Chrysler. During the facility walk through, AQD staff Ms. Kelly and I observed metal fabrication activities such as cutting, routing, drilling, machining, surface grinding, buffing, sanding, and gritblasting. We observed 16 large and small forming presses. The machining operations are exempt from permit to install requirements per AQD Administrative Rule R 336.1285(l)(vi). We observed 2 laser cutting equipment, 1 plasma cutting equipment, and 46 mig welding equipment that are exempt from permit to install requirements per AQD Administrative Rule R 336.1285(i & j). All the above processes are exhausted indoors.

The facility operates a powder coating line that includes a detergent wash booth, gas dryer, powder coating booth, and a bake oven. The powder coating booth has a filter system that reclaims the powder for reuse. This process is exempt from permit to install requirements per AQD Administrative Rule R 336.1287(d).

Permit to Install No. 96-09 was issued for 2 water based coating booths. The permit contained federally enforceable restrictions of single and aggregate Hazardous Air Pollutants (HAPs) emissions thus making the permit a synthetic minor for HAPs and an opt out permit from the requirements of the Title V of Clean Air Act of 1990, Renewable Operating Permit program. During the pre-inspection process, Ms. Korczak showed me a spreadsheet that contained the monthly gallons of coatings used for FY2014, the VOC emissions, the individual, and combined HAPs emitted. The spreadsheet was missing data for monthly 12 month rolling totals for VOC, individual and combined HAPs. After conferring with Mr. Light, she found out that she messed up her current spreadsheet. Mr. Light was trying to print the records from his computer but was not getting it right. I decided to have Mr. Light send the spreadsheet to me electronically. During the inspection, we observed one spraybooth that appeared to be unused and have some metal parts stacked in front of the booth. I informed

Mr. Thompson that the filters have to be in place and operating properly even when the booths are unused. We also observed an employee conducting touch up spray painting on one of the racks outside of the booth. Any potential overspray of coating appeared to be exhausted indoors. The rack appeared to be coming from the powder coating process oven. I informed Mr. Thompson that all spray coating activities need to be conducted in the spraybooth unless it's an aerosol spray can touch up coating only.

At the office, I printed a copy of the spreadsheet and verified the data. Per PTI No. 96-09 special condition EUPAINTLINE(I)(1), the updated spreadsheet for December 2014 showed 1.39 tons rolling 12 month total VOC and less than the permit limit of 36 tons. Per PTI No. 96-09 special conditions FGFACILITY(I)(1 & 2), the highest total monthly 12 month rolling individual HAP emission was Triethylamine at 86.35 lb. (0.04 ton) and less than the 9.0 tpy permit limit. The total combined monthly 12 month rolling HAPs emissions for December 2014 were 158.99 lb. (0.08 ton) and less than the 22.5 tpy permit limit. The downward trend in the facility's VOC and HAPs emissions were due to the facility's efforts to increase utilization of powder coating and move away from spray coating process. Per PTI No. 96-09 special condition EUPAINTLINE(III)(1, 2, & 3), I observed lids closed and spent filters disposed properly. Per PTI No. 96-09 special condition EUPAINTLINE(IV)(1 & 2), filters were in place and the facility uses air assisted airless spray gun for the one operating spray booth. Per PTI No. 96-09 special conditions EUPAINTLINE(VI)(1, 2, 3, & 4) and FGFACILITY (VI)(1 & 2), the facility appeared to be calculating and maintaining the recordkeeping requirements as contained in the applicable requirements for the permit.

I did not observe any noncompliance issues during the inspection.

NAME F/A Ji DATE 4/1/2015 SUPERVISOR CJE