

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

A942636543

FACILITY: PRO WELD LLC		SRN / ID: A9426
LOCATION: 50625 RICHARD W BLVD, CHESTERFIELD		DISTRICT: Southeast Michigan
CITY: CHESTERFIELD		COUNTY: MACOMB
CONTACT: Randall Smith , Plant Manager		ACTIVITY DATE: 08/17/2016
STAFF: Rem Pinga	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Unannounced Level 2 Self-initiated inspection		
RESOLVED COMPLAINTS:		

On August 17, 2016, 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.

I found out that the company has been sold out to Camryn Fabrication, LLC. Due to the change of ownership, the facility name was changed to Pro Weld, LLC. I have obtained a copy of MDEQ, Licensing and Regulatory Affairs (LARA) documentation on the registration name change. The company also sent AQD a notice letter of the ownership change and acceptance of responsibility for AQD Permit to Install (PTI) 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 Mr. Sonny Cooper, Manager for Operations. Mr. Cooper accompanied me during the walk through inspection. Ms. Dawn Korczak is still working for the company but has taken a different job responsibility. I also met Mr. Randall Smith, new Plant Manager.

Although under new management, the facility still conducts the same business and manufactures metal racks primarily for the automotive industry. During the facility walk through, I observed the same metal fabrication activities such as cutting, routing, drilling, machining, surface grinding, buffing, sanding, and gritblasting. The machining operations are exempt from permit to install requirements per AQD Administrative Rule R 336.1285(i)(vi). I observed laser cutting equipment, plasma cutting equipment, and 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 continues to operate 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 inspection, I observed one spraybooth with mat filters in place. I informed Mr. Cooper that the filters have to be properly set in place with no gaps to prevent pass through of coating solid particles/oversprays that could potentially get into parked vehicles outside the facility or at next door neighbors' lots which may result into paint fallout complaints. I did not observe touch up spray painting on racks outside of the booth as per my observation and comment during the last inspection.

During the post inspection meeting, I asked for coating use records. Mr. Cooper mentioned that he was not aware of the recordkeeping requirements nor the existence of AQD air use PTI No. 96-09. I gave him a copy of the permit and showed the recordkeeping requirements in the permit. He asked for time to investigate. Towards the end of August 2016, I received a telephone voice message from Mr. Smith that the new management has not found any records on coating usage/volatile organic compound (VOC) emissions. He mentioned that the previous company management may not have endorsed these requirements to the new management. On September 14, 2016, I contacted Mr. Smith to find out any recent developments on the PTI coating use recordkeeping requirements. Mr. Smith owned the responsibility of the previous owner's oversight of not endorsing these responsibilities to the new management but committed to work into compliance with the PTI requirements. I discussed with Mr. Smith the AQD's protocols/procedures of a Violation Notice (VN), response to the VN, and compliance requirements including a potential for an escalated enforcement activity by the AQD Enforcement Section.

Overall, the facility is currently in violation of PTI No. 96-09 special condition EUPAINTLINE(VI)(1, 2, 3, & 4), for having no records on coating usage and calculations on monthly and 12-month rolling VOC emissions as determined monthly. These recordkeeping requirements are necessary to show compliance with PTI No. 96-09 special condition EUPAINTLINE (I & II) emission and VOC content limits. The facility is also in violation of PTI No. 96-09 special conditions FGFACILITY (VI)(1 & 2), for not keeping records of individual and combined Hazardous Air Pollutants (HAPs) emissions based on monthly 12 month rolling totals to show compliance with PTI No. 96-09 special conditions FGFACILITY (I)(1 & 2) emission limits. A VN will be sent to the company.

NAME



DATE

9/15/2016

SUPERVISOR

