

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

B177831130

FACILITY: Wemco		SRN / ID: B1778
LOCATION: 2465 23 Mile Road, SHELBY TWP		DISTRICT: Southeast Michigan
CITY: SHELBY TWP		COUNTY: MACOMB
CONTACT: Jerry Maedel		ACTIVITY DATE: 08/25/2015
STAFF: Joyce Zhu	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: self-int. inspection		
RESOLVED COMPLAINTS:		

On 7/29, I tried to conduct a self-initiated inspection at Wemco, which is located on 2465 23 Mile Rd., Shelby Twp. The inspection is initiated due to an active permit (#435-78) issued to Fabricators Div., King-Seeley Thermos Company for the same site without any current information of the location. I arrived at the area around 12:15 PM. The location is now occupied by Wemco. I was told that I couldn't inspect the site without speaking to Mr. John Krakake. On 7/30/2015, I called Mr. Krakake about the inspection. On 8/25 I went back to the site & met with Mr. Joe Szkola from the facility. I introduced myself & explained the purpose of the inspection. Mr. Szkola took me to see the process.

#### Inspection:

The company manufactures reeling equipment. Metal fabrication, such as machining, welding, drilling, & grindings, is taken place inside the plant. There were four saws during the inspection. All these activities are vented to the general plant environment & are exempted from the permit to install requirements per Rule 285. In addition to the metal fabrication activities, there are two booths onsite. During the inspection, I saw overspray inside the booths. According to the company, they used HVLP guns in the coating process. Xylene is used to clean the guns. Waste solvents were stored in a 55-gallon drum which will be picked up by Cadillac, a solvent waste disposal facility. All paints were stored in fire proofed cabinets. I didn't observe any spill in the storage area. According to the company, they don't measure paint viscosities. On an average, they operate the paint process 6 -6 1/2 hours a day & five day per week. According to Mr. Szkola, the booths are purchased when they first moved to the site in 1999. He was not aware any of the permit conditions from Fabricators Div., King-Seeley Thermos Company. On 9/9, the company submitted the paint usage record. Mr. Jerry Maedel, the purchasing manager of the facility, told me that majority of the paints are used in the large spray booth. They used hand held aerosol cans in the small spray booth mostly. According to the company's paint usage record, they have used less than 350 gallons of coating per year since 2010. It appeared that the company would be able to meet Rule 287(c) exemption for the booths. However, the potential to emit from the exempted booths would be more than 17 tons per year using VOC density of 7.34 pounds per gallon. Because the company has not obtained any enforceable restrictions on HAP emissions, the VOC emission could be treated as HAP emissions. This would put the company into the major source category; I explained the scenario to Mr. Maedel & advised him to obtain an opt-out permit. Although Permit #435-78 is for a paint booth, since the company claimed that the booths onsite were purchased after they moved to the site, the permitted booth had been removed before they occupied the site. The permit should be voided.

In conclusion, the company appeared to operate in compliance with the permit to install requirements. Once the company obtains an opt-out permit, or a permit to limit the VOC emission to become a minor source, they will be able to get out of Title V obligations. As of 9/10/2015, the company has contacted OEA to get help for opt-out permit.

NAME Joyce B      DATE 9/15/15      SUPERVISOR CTE