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

FACILITY: S & H SORTING AND PACKING		SRN / ID: B8626
LOCATION: 2401 20TH ST, PORT HURON		DISTRICT: Southeast Michigan
CITY: PORT HURON		COUNTY: SAINT CLAIR
CONTACT: Susan Hawks-Johnson, Owner		ACTIVITY DATE: 03/11/2015
STAFF: Rem Pinga	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced L	evel 2 Target Inspection	
RESOLVED COMPLAINTS		

On March 11, 2015, I conducted an unannounced level 2 target inspection at S & H Sorting and Packing, Inc. located at 2401 20<sup>th</sup> Street, Port Huron, Michigan 48060. 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 air use Permit to Install (PTI) No. 111-08. During the inspection, I spoke with Ms. Susan Hawks-Johnson, company owner. Ms. Hawks-Johnson used to be Ms. Susan Guzdial. At 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. Hawks-Johnson. Mr. Joseph Guzdial accompanied me to check on the incinerator and conduct a facility walk through.

PTI No. 111-08 was issued for a controlled pyrolysis cleaning furnace or a burnoff oven (EUBURNOFF). The equipment incinerates particulate matter coating oversprays in paint racks. For this company, the racks were used to hang parts for powder coat process. The facility operates a powder coating process line exempt from permit to install requirements per State of Michigan, Department of Environmental Quality (DEQ), Air Quality Division (AQD) Administrative Rule R 336.1287(d), also known as AQD Rule 287(d).

During the pre-walk through meeting, Ms. Hawks-Johnson informed me that the facility has been having problems maintaining the incinerator afterburner temperature at the required 1400°F as required by PTI No. 111-08, special condition no. EUBURNOFF(1.7). She mentioned that she has been spending money to address the problem since sometime last year. The changes included replacing the stack and replacing parts as recommended by the technicians that she has been hiring to fix the problem. He introduced me to Mr. Joseph Guzdial, Operations Manager, who has oversight in the proper operation of the facility's process equipment that include the powder coating process and the incinerator. Mr. Guzdial informed me that several people have come to trouble shoot and try to fix the problem. He is also in contact with the incinerator supplier from Texas who suggested for the facility to get in touch with the closest technician that is familiar with the operations of the incinerator model and is based in the Midwest. To have an idea of the duration of the problem, I requested for temperature log recordkeeping.

During the walk through, Mr. Guzdial took me to the incinerator to explain and show me the work that has been conducted to address the temperature problem. Per PTI No. 111-08 special condition no. 1.1, I did not observe any visible emissions from the burnoff oven. Per PTI No. 111-08 special condition no. 1.2, the company uses natural gas as fuel for the oven. Per PTI No. 111-08 special conditions no. 1.3 & 1.4, I observed some racks with coating overspray waiting in line to be incinerated but no plastics or halogen containing materials

such as PVC or plastisol. Per PTI No. 111-08 special condition no. 1.6, the company submitted 12-month rolling hours of operation that started in March 2014 and showed 641 hours in February 2015. This was less than the 1536 hours permit limit. In March 2013, I sent the facility a Violation Notice for not keeping records of a monthly 12-month rolling total of hours of operation. Per PTI No. 111-08 special condition no. 1.7, the burnoff oven was off at the time of the inspection. However, I obtained once a day temperature records that Mr. Guzdial started manually recording on the days the oven was operating from August 4, 2014 through March 3, 2015 showing the afterburner temperature range from 1220°F through 1551°F. From August 2014 through January 2015, the facility recorded only 3 days of afterburner temperature that met the 1400°F permit limit and 10 days through March 3, 2015. Per PTI No. 111-08 special conditions 1.8, 1.9, and 1.10, Mr. Guzdial mentioned that he noticed a temperature gap between the digital temperature monitor readings attached to the oven and the datalogger temperature readings which prompted him to record the temperatures manually on a daily basis as backup. The datalogger records the temperature on a continuing basis. It also appeared that the interlock system may not be operating properly as it was supposed to ensure that the primary burner would not fire unless the afterburner temperature reached 1400°F. Per PTI No. 111-08 special condition no. 1.13, the datalogger device that continuously record the temperature in the primary chamber and the afterburner temperature may not be operating properly as indicated by Mr. Guzdial.

On 3/19/2015, I received additional records from Mr. Guzdial. The temperature records ranged from December 23, 2013 through March 3, 2015. These records showed that the noncompliant afterburner temperature readings started on May 27, 2014.

As a result of my inspection, I will send the company a Violation Notice for the above noncompliance issues.

NAME Lill h

DATE 4/1/20/5 SUPERVISOR