## DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION ACTIVITY REPORT: Self Initiated 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: 06/01/2016
STAFF: Rem Pinga	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced Lev	el 2 Self-initiated Inspection	
RESOLVED COMPLAINTS:		

On June 1, 2016, I conducted an unannounced level 2 self-initiated 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. 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. Ms. Johnson accompanied me to conduct a facility walk through inspection.

PTI No. 111-08 was issued to the facility for a controlled pyrolysis cleaning furnace or a burnoff oven (EUBURNOFF). The equipment incinerates particulate matter coating oversprays in paint racks. For this facility, the racks were used to hang parts for powder coat process. The facility operates a metallic 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. Johnson informed me that the facility has not operated the burnoff oven since my March 2015. This inspection was conducted to spot check the facility on the most current status of the burnoff oven. As a background, I conducted a level 2 inspection at this facility last March 11, 2015 and verified PTI No. 111-08 special conditions noncompliance issues and subsequently sent a Violation Notice (VN) on April 2, 2015 for improperly operating the burnoff oven due to monitoring/recording device and temperature/burner interlock system malfunctions, and conducting incineration operations where the minimum afterburner temperature is less than the permit limit of 1400°F. The VN was subsequently resolved after verifying in June 2015 that the facility has padlocked the burnoff oven, removed the gas (fuel line) connection, and confirming through invoices, that the facility is sending the racks for cleaning to an outside vendor. During this inspection, Ms. Johnson showed me invoices that the facility continues to ship powder coating racks for cleaning to Chemico Systems located in Chesterfield Township. I requested for a sample copy of the invoices.

Next, Ms. Johnson took me for a walk through inspection inside the facility including the incinerator/burnoff oven to show me that the unit remained padlocked and inoperable. On the way to the incinerator, I observed employees preparing automotive internal metal parts such as hood clamps for powder coating. Ms. Johnson also mentioned that some parts go to Powder Cote II for e-coat process instead of powder coat. I also observed powder coated parts being packed for shipment to customers. At the far end of the building, I observed the burnoff oven still padlocked, unhooked from gas connection and appeared inoperable. I did

not observe any visible emissions inside and outside the facility.

Overall, I did not observe any noncompliance issues during the inspection. PTI No. 111-08 will remain active since the equipment is still installed at the facility.

NAME

DATE 6/6/2016 SUPERVISOR