

M3847
MANILA

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

M384729307

FACILITY: RIM CUSTOM RACKS		SRN / ID: M3847
LOCATION: 6501 E MC NICHOLS RD, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Todd Schorer, President		ACTIVITY DATE: 04/23/2015
STAFF: Usama Amer	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Targeted Inspection of an Opt-out Source		
RESOLVED COMPLAINTS:		

On April 23, 2015, I conducted a Scheduled Inspection at RIM Custom Racks (source), located at 6501 E. McNichols Rd, Detroit, Wayne County. The purpose of the inspection was to determine the source's current compliance status with the federal Clean Air Act of 1990, as amended; Part 55 of Michigan Public Act 451 of 1994, as amended; the administrative rules, and the conditions of PTI No. 211-06A. Mr. Todd Schorer, President, and Ms. Traci Wolfenbarger, HR, represented the source during the inspection.

BACKGROUND & PROCESS DESCRIPTION

- The source began in 1978 by repairing and repainting material handling racks and containers for the automotive industry. They soon expanded their services to designing, building, and modifying custom racks and containers and have recently broadened their client base to include numerous industries.
- The source employs about 80 people and operates two 8-hour shifts and five days per week.
- Opt-out PTI 211-06A was issued to the source in January 2007. Below threshold limits for VOC and HAPs were imposed by PTI 211-06A.
- According to Todd, the source has been applying HAPs free coatings since the issuance of PTI 211-06A.
- In April, 2012, 4 coating samples were collected from the source and forwarded to Trace Analytical, located in Muskegon, Michigan, for VOC and HAPs analysis. Trace's analytical report indicated that only 3 out of the 4 coating samples had complying VOC and HAPs contents. Consequently, the source was issued a Violation Notice (VN), on 6/4/2012, for exceeding the 3.5 lb/gal VOC content in the 4th coating (Ford Blue) sample.

In July, 2012, the above VN was resolved, as the source conducted analysis of coating split samples and provided lab results showing compliance with VOC content limit.

The INSPECTION:

- PTI 211-06A covers the following Emission Units and Flexible Group:

- 1) EU6501-BOOTH: One (1) miscellaneous metal parts spray paint booth
- 2) EU6475-BOOTH: One (1) miscellaneous metal parts spray paint booth
- 3) EU6535-BOOTH: One (1) miscellaneous metal parts spray paint booth
- 4) FGFACILITY: All process equipment at the stationary source including equipment covered by other permits, grandfathered equipment and exempt equipment.

- Only EU6475-BOOTH is in operation. EU6501-BOOTH and EU6535-BOOTH have been dismantled and removed in 2012.

EU6475-BOOTH

* S. C. #2.1a – stipulates that the VOC annual emission rate not to exceed 50 tpy, based on a 12-month rolling time period as determined at the end of each calendar month.

- The highest annual VOC emission rate of 21.03 tpy, based on a 12-month rolling time period as determined at the end of each calendar month, was reported for 4/14. Attachment A

* S. C. #2.1b - stipulates that the VOC content in the used coatings not to exceed 3.5 lb/gal.

1) According to Todd, the source has never conducted chemical analysis, on the coatings used, pursuant to USEPA Method 24 as required by S.C. #2.6 of the PTI.

2) For VOC contents in the coatings used, the source depends solely on the data provided in each coating's MSDS.

3) The following MSDS were provided by the source during the last inspection of 4/4/12, and are available in the file:

<u>Attachment No.</u>	<u>Product Name</u>	<u>VOC Content (lb/gal)</u>
B.1	Gray Enamel	3.443
B.2	Black Enamel	3.495
B.3	Ford Sign Blue	3.488
B.4	Gloss Black Enamel	3.494
B.5	Buff Primer	3.46
B.6	Silver Fox	3.488
B.7	Guantlet Gray Enamel	3.443

4) The following coatings are the most used by the source:

- a. Ford Sign Blue
- b. Gloss Black Enamel
- c. Low Gloss Black
- d. Medium Beige
- e. Safety Green

5) All coatings are received, by source, in a ready-to-use condition. No thinning or viscosity adjustment is performed by the source.

* S. C. #2.3 - stipulates that the spent filters shall be disposed in a manner which minimizes the introduction of air contaminants to the outer air.

- According to Todd, the source manifests the spent filters, as they are shipped off site for proper disposal.

* S. C. #2.4 - stipulates that EU6475-BOOTH shall not operate unless all respective exhaust filters are installed, maintained and operated in a satisfactory manner.

- Dry filters are installed on both sides of EU6475-BOOTH. During the inspection, the filters appeared to be dirty; although, they were replaced a week earlier.

* S. C. #2.5 - stipulates that EU6475-BOOTH shall be equipped, and maintain with airless applicators or comparable technology with equivalent or higher transfer efficiency.

- According to Todd, the source uses airless applicators.

* S. C. #2.6 - stipulates that the VOC content, water content and density of any coating or solvent, as applied and as received, shall be determined using federal Reference Test Method 24.

- According to Todd, the source has never conducted chemical analysis, on the coatings used, pursuant to USEPA Method 24 as required by S.C. #2.6 of the PTI. The VOC contents in the coatings used are based on the data provided in each coating's MSDS.

* S. C. #2.7 - stipulates that all required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month.

- Attachment A

* S. C. #2.8 - stipulates that a current listing from the manufacturer of the chemical composition of each coating or solvent, including the weight percent of each component shall be maintained. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor.

- Records were previously provided by the source and are available in AQD's file.

* S. C. #2.9 - stipulates that the following information for EU6475-BOOTH shall be kept:

- a) Daily gallons (with water) of each coating and solvent used.
- b) VOC content (minus water and with water) of each coating and solvent as applied.
- c) VOC emission calculations determining the volume-weighted average VOC content of the coatings as applied on a calendar day basis.
- d) VOC mass emission calculations determining the monthly emission rate in tons per calendar month.
- e) VOC mass emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The source shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.

- Records were previously provided by the source and are available in AQD's file.

FGFACILITY

* S. C. #4.1a, #4.1b & #4.1d – stipulate that the HAPs individual, aggregate, and VOC annual emission rates not to exceed 9.0 tpy, 22.5 tpy, or 90 tpy, respectively, based on a 12-month rolling time period as determined at the end of each calendar month.

- According to Todd, the source has been applying HAPs free coatings since the issuance of PTI 211-06A.

- The highest annual VOC emission rate of 21.03 tpy, based on a 12-month rolling time period as determined at the end of each calendar month, was reported for 4/14. Attachment A

- The annual VOC emission rate of 19.2 tpy, based on a 12-month rolling time period as determined at the end of each calendar month, was reported in the source's 2014 MAERS. Attachment B

* S. C. #4.2 & #4.3 – stipulate that the coatings and solvents used in FGFACILITY shall not contain any xylene (CAS No. 1330-20-7) or 1-propoxy 2-propanol (CAS No. 1569-01-3).

- Records were previously provided by the source and are available in AQD's file.

* S. C. #4.4 – stipulates that the HAP content of any coating or solvent as received and as applied, using manufacturer's formulation data shall be determined. Upon request of the AQD District Supervisor, the permittee shall verify the manufacturer's HAP formulation data using EPA Test Method 311.

- According to Todd, the source has been applying HAPs free coatings since the issuance of PTI 211-06A.

* S. C. #4.5 – stipulates that the VOC content, water content, and density of any coating or solvent, as applied and as received, using federal Reference Test Method 24 shall be determined.

- According to Todd, the source has never conducted chemical analysis, on the coatings used, pursuant to USEPA Method 24.

* S. C. #4.6 - stipulates that all required calculations shall be completed in a format acceptable to the AQD District Supervisor by the 15th day of the calendar month, for the previous calendar month.

- Attachment A

* S. C. #4.7 - stipulates that the following information for EU6475-BOOTH shall be kept:

a) Gallons or pounds of each HAP containing material used.

b) Where applicable, gallons or pounds of each HAP containing material reclaimed.

c) HAP content, in pounds per gallon or pounds per pound, of each HAP containing material used.

d) Individual and aggregate HAP emission calculations determining the monthly emission rate of each in tons per calendar month.

e) Individual and aggregate HAP emission calculations determining compliance with Special Condition Nos. 4.1a through 4.1c as determined at the end of each calendar month.

The source shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.

- According to Todd, the source has been applying HAPs free coatings since the issuance of PTI 211-06A.

- Records were previously provided by the source and are available in AQD's file.

* S. C. #4.8 - stipulates that the following information for EU6475-BOOTH shall be kept:

- a) Daily gallons or pounds of each VOC containing material used.
- b) Where applicable, gallons or pounds of each VOC containing material reclaimed.
- c) VOC content, in pounds per gallon or pounds per pound, of each VOC containing material used.
- d) VOC emission calculations determining the monthly emission rate in tons per calendar month.
- e) VOC emission calculations determining the annual emission rate in tons per 12-month rolling time period as determined at the end of each calendar month.

The source shall keep the records in a format acceptable to the AQD District Supervisor. The permittee shall keep all records on file for a period of at least five years and make them available to the Department upon request.

- Records were previously provided by the source and are available in AQD's file.

CONCLUSION:

The source appears to operate in compliance with the air quality rules and regulations and the conditions of PTI No. 211-06A.

NAME Sam Amer DATE 5/5/15 SUPERVISOR JK