

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

N008152510

<b>FACILITY:</b> Paint Work Inc		<b>SRN / ID:</b> N0081
<b>LOCATION:</b> 2088 Riggs Ave, WARREN		<b>DISTRICT:</b> Warren
<b>CITY:</b> WARREN		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Mark Shamblin , Vice President		<b>ACTIVITY DATE:</b> 11/21/2019
<b>STAFF:</b> Joe Forth	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> On-site Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On November 21, 2019, Air Quality Division (AQD) staff Joseph Forth, conducted an unannounced inspection of Paint Work Inc. (N0081), located at 2088 Riggs Road, in Warren, Michigan. The purpose of this inspection was to determine the facility's compliance with the Federal Clean Air Act, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, Michigan's Air Pollution Control Rules, Permit to Install (PTI) No. 124-01, the Halogenated Solvent Cleaner NESHAP.

Paint Work Inc. conducts miscellaneous metal (mainly steel and aluminum) coatings primarily for military contracts. Operating hours are between 7:00am and 3:30pm, Monday through Friday. Paint Work, Inc. currently 4 employees

At this facility, Paint Work Inc. operates two manual spray coating lines (EU\_Line-01 & EU\_Line-02) which include a total of three paint booths, a series of four metal surface prep tanks, and a halogenated solvent vapor degreaser tank.

The coating lines are permitted under PTI No. 124-01 which contains enforceable restrictions on volatile organic compound (VOC) and Hazardous Air Pollutant (HAP) emissions to opt the facility out of the Title V Renewable Operating Permit (ROP) program. The degreaser tank is subject to 40 CFR 63 Subpart T, the Halogenated Solvent Cleaning NESHAP, because the facility uses Trichloroethylene (TCE) as solvent.

#### EU\_Line-01 and EU\_Line-02

EU\_Line-01 includes parts that are painted in "Booth 1" (which is actually 2 booths side by side) and the conveyor line that goes through heat lamps as part of the drying process.

EU\_Line-02 ("Booth 3") is located in an adjacent section of the building. Previously, this booth was used to manually paint larger parts which were then transferred into a natural gas fired oven for drying. The motor on the oven is broken and the oven is no longer in use. Booth 3 was unused in 2014/2015 and the room is currently be used as storage.

During my inspection, Mr. Mark Shamblin, Vice President, showed me the permitted equipment. Mr. Shamblin showed me EU\_Line\_01 where they manually apply the coating to the metal parts and the drying oven. The coating line had dry filters installed properly. Mr. Shamblin said that filters are replaced once per day. The drying oven does not use any fuel, it heats via electricity/lamps and does not vent to the outside ambient air. He showed me the cold cleaner that uses several different solvents. The lid appeared to be properly fitted and was closed while not in use. Operation procedures were clearly posted on the equipment.

#### PTI No. 124-01

VOC emission records were provided via excel sheet. The file can be found in S:\Air Quality Division\STAFF\Joe Forth\N0081 Paint Work FY20 Inspection. All VOC data is being referenced from this document unless otherwise stated.

#### EU\_Line-01

- VOC emission limit of 2000 pounds per month. The permittee has not exceeded this limit in any of the months reviewed. The highest total for 2019 was in May at 907.7 lbs.
- VOC emission limit of 10 tons per year. The permittee has not exceeded this limit. 2018 total VOC emissions were 3.997 tons. The 12-month rolling time period total of VOCs from November 2018 through October 2019 was 4.43 tons.

3. The permittee has been keeping records of the following information on a monthly basis:
  - a. Gallons of each material (coatings, reducers, cleaners, etc.) used. Usage of each VOC containing material was provided.
  - b. VOC content of each material used. VOC content of each material used was provided.
  - c. Monthly VOC emission totals. Monthly VOC calculations were provided.
  - d. 12-month rolling time period VOC emission totals. 12-month VOC total calculations were provided.

4. The exhaust stacks of EU\_Line-01 discharge unobstructed vertically to the outside ambient air.

#### EU\_Line-02

This emission unit has not been operated for approximately 5 years. Paint Work, Inc. has not ruled out using it in the future, but currently is not operating the paint line nor drying oven.

The exhaust stack for the coating line is unobstructed. The exhaust stack for the drying oven was removed.

#### FG\_Lines

11. A VOC emission limit of 126.7 pounds per day. In the provided calculation, there does not appear to be a day where the permittee exceeded the limit. Most days are in the range of 20-40 pounds per day.

12-14. The permittee properly recovers and disposes of all waste coatings, solvents and spent filters.

15. The permittee shall not operate the booth portions of the FG\_Lines unless all respective exhaust filters are installed and operating properly. The filters in EU\_Line-01 appeared to be properly installed, all filters are replaced daily.

16. The permittee shall equip the booths with HVLP applicators. The facility only uses HVLP applicators.

17. The permittee received approval from the AQD to use manufacturer's formulation instead of Method 24 testing.

18. The permittee keeps and showed me the SDS for all materials currently being used at the facility.

19. The permittee has been keeping daily records of the following:

- a. Gallons (with water) of each material used. Usage of each material was provided.
- b. VOC content of each material used. VOC content of each material used was provided.
- c. Daily VOC emission rate calculations in pounds per day. Calculations were provided, daily totals usually fell between 20 and 40 pounds of VOC.

#### FG\_SS (Stationary Source)

20. Individual HAP emission limit of 9.0 tons per 12-month rolling time period. The largest amount of individual HAPs used was TCE at 2.64 tons from December 2018 through November 2019. (Attachment A and digital document)

21. Aggregate HAPs emission limit of 22.5 tons per 12-month rolling time period. The aggregate HAP emission limit for the facility from December 2018 through November 2019 was 3.50 tons. (Attachment A and digital document)

22. The permittee uses manufacturer data to determine the HAP content of each material used with AQD approval.

23. The permittee was able to present SDSs for all materials used at the facility.

24. The permittee has been keeping monthly records of the following:

- a. Gallons (with water) of each material used. Usage of each material was provided.
- b. HAP content of each material used. HAP content of each material used was provided.
- c. Daily HAP emission rate calculations in pounds per month. Calculations were provided, monthly totals usually fell between 130 and 200 pounds of HAPs.

#### 40 CFR Part 63 Subpart T, Halogenated Solvent Cleaning NESHAP

For the degreaser, Mr. Shambhlin stated that he conducts daily inspections on the cover, the seals, and other mechanical parts for potential leaks and to make sure employees are using the degreaser properly and keeping the cover closed (See Attachment B). During the inspection, the degreaser appeared to be operating properly and appeared to have the correct freeboard ratio (greater than 0.75).

**Conclusion**

The permittee appears to be in compliance with PTI No. 124-01 and 40 CFR Part 63 Subpart T, Halogenated Solvent Cleaning NESHAAP.

NAME Frank M. Tarkenton

DATE 9-28-2020

SUPERVISOR Sebatianng Kallumkal