

N0329  
M. MillerDEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

N032973017

FACILITY: Z TECHNOLOGIES CORP		SRN / ID: N0329
LOCATION: 26500 CAPITOL AVENUE, REDFORD TWP		DISTRICT: Detroit
CITY: REDFORD TWP		COUNTY: WAYNE
CONTACT: Ellis Breskman , President		ACTIVITY DATE: 02/27/2024
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Scheduled inspection with EPA		
RESOLVED COMPLAINTS:		

DATE OF INSPECTION : February 27, 2024

TIME OF INSPECTION : 9:00 am

INSPECTED BY : Jill Zimmerman

EPA INSPECTORS : Aileen Drum

Emma Leeds

Karina

PERSONNEL PRESENT : Wayne Hall, Plant Manager

FACILITY PHONE NUMBER : 313-937-0710

FACILITY EMAIL : ellisbreskman@msn.com

## FACILITY BACKGROUND

Z Technologies is a chemical batch processing plant that manufactures sealants and coatings for the automotive industry. This inspection was initiated by the EPA, who took the lead on this inspection.

## REQUIRED PPE

During the onsite inspection, I wore steel toed shoes, a safety vest and safety glasses.

## COMPLAINT/COMPLIANCE HISTORY

No complaints have been made regarding this facility since it was last inspected.

## PROCESS EQUIPMENT AND CONTROLS

The facility mixes solvents and solid components to create sealants and coatings. At times these mixtures create chemical reactions which either require additional heat or release heat. The mixing vessels are covered and at times pressurized.

The facility operates two natural gas fired boiler to provide steam and heat as needed. One boiler is 2.4 MMBtu / hr and the other is 6.28 MMBtu / hr.

## **INSPECTION NARRATIVE**

I arrived at the facility with Aileen Drum, Emma Leeds, and Karian from the EPA. We met with Mr. Wayne Hall, Plant Manager. Together we discussed the process at the facility, and we explained the reason for the visit. Mr. Hall explained that Mr. Ellis Breskman is the owner and responsible for collecting all records, though he was out of the office. Next, we walked through the facility and observed the process.

## **APPLICABLE RULES/PERMIT CONDITIONS**

This facility, formally a Title V source, is an opt-out source for HAPs based on the potential to emit (PTE). The facility is currently operating under permit 184-97A and this permit is evaluated below.

## **EUPROCESS**

**Emission Limits – Compliance.** The facility reported emitting 11.73 tons of VOC in March 2023 for the highest 12-month rolling time period which is less than the permitted limit of 27.1 tons per year VOC. The facility reported operating for 2206.2 hours in March 2023. The average hourly emission rate of 10.6 pounds VOC per hour is less than permitted limit of 16.0 pounds per hour.

**Material Usage Limits – Compliance.** The facility produced less than 1,500,000 gallons of product for the highest 12-month rolling time period in June 2023, which is less than the permitted limit of 2.260 million gallons per year.

**Process / Operational Limits – Compliance.** The facility operated 2206.2 hours for the highest 12-month rolling time period in March 2023, which is less than the permitted limit of 3400 hours. During the onsite inspection it appeared that all VOC and HAP containing materials were handled in a manner to minimize the generation of fugitive dust. All waste solvents are stored in closed containers.

**Equipment – Compliance.** During the onsite inspection, all tanks were properly covered.

**Recordkeeping / Reporting / Notification – Compliance.** All required records are properly maintained onsite and are attached to the emissions report annually. As a note, the

spreadsheet documenting emissions for calendar year 2023 has monthly headings which are misidentified as 2024.

**Stack / Vent Restrictions – Compliance.** The stack was properly installed and has not been modified since the at least the last onsite inspection.

#### **FGFACILITY**

**Emission Limits – Compliance.** During the highest 12-month rolling time period of June 2023, the facility reported emitting less than 1 ton of HAPS, which is less than the permitted limit of 8.9 tpy individual HAP and 22.4 tpy total HAPs.

**Recordkeeping / Reporting / Notification – Compliance.** The proper records are maintained and submitted annually as part of the annual emissions report.

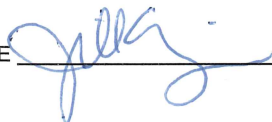
#### **SLEIS REPORT REVIEW**

This report was received on time and appears to have been reported accurately.

#### **FINAL COMPLIANCE DETERMINATION**

**Z Technology** appears to be operating in compliance with all state and federal regulations as well as all evaluated permit conditions.

NAME



DATE

10/24/24

SUPERVISOR

JK