

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

N087152448

<b>FACILITY:</b> Conformance Coating and Prototype, INC		<b>SRN / ID:</b> N0871
<b>LOCATION:</b> 2321 BUSHA HWY, MARYSVILLE		<b>DISTRICT:</b> Southeast Michigan
<b>CITY:</b> MARYSVILLE		<b>COUNTY:</b> SAINT CLAIR
<b>CONTACT:</b> Wayne Hertlein , General Manager		<b>ACTIVITY DATE:</b> 01/16/2020
<b>STAFF:</b> Shamim Ahammod	<b>COMPLIANCE STATUS:</b> Non Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Conducted a scheduled inspection of Conformance Coatings & Prototype, Inc (SRN# N0871).		
<b>RESOLVED COMPLAINTS:</b>		

On Thursday, January 16, 2020, Michigan Department of Environment, Great Lakes and Energy (EGLE) - Air Quality Division (AQD) staff, I, Shamim Ahammod, conducted a scheduled inspection of Conformance Coatings & Prototype, Inc (SRN# **N0871**) located at 2321 Busha HWY, Marysville, Michigan. 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) and the Air Pollution Control Rules and Permit to Install (PTI) No. No. 75-04.

### SOURCE DESCRIPTION

Conformance Coatings paints automotive and non-automotive plastic parts, and some plastic business machine parts (very limited at this time). The facility operates six paint spray booths, three natural gas-fired ovens ( 2 inline ovens with overhead conveyors and 1 batch oven), and three infrared lights for curing. Currently, the facility operates just 1 shift, 5 days per week.

### INSPECTION & REGULATORY ANALYSIS

I arrived at the facility at approximately 1:00 PM. I entered the front lobby of the office and met with Mr. Jeff Jones 'JJ' , the President and Owner, of Conformance Coatings & Prototype (CCP), Inc. He introduced me to Mr. Wayne Hertlein, General Manager, of CCP. I introduced myself to the CCP's staff and stated the purpose of the inspection. During the pre-inspection meeting, we discussed PTI No 75-04. Then Mr. Hertlein and I walked through the facility and observed following plastic parts coating line: EGCCPBOOTH0001, EGCCPBOOTH0002, EGCCPBOOTH0003, EGCCPOVEN0004, EGCCPBOOTH0005, EGCCPBOOTH0006 and EGCCPBOOTH0007. At the time of inspection, EGCCPBOOTH0001 and EGCCPBOOTH0003 were in operation.

### FGPPCOATING

#### Emission Limits

Pollutant	Equipment	Emissions record from January through December 2019	Limit	Time Period	Rule/Permit Condition Violated	Compliance
VOCs	FGPPCOATING	The records provided demonstrate that actual emissions of VOC from the FGPPCOATING process equipment are 10808 tpy.	30.0 tpy	12-month rolling	PTI No. 75-04 FGPPCOATING SC 1.1a	Non-compliance
VOCs	Each Individual Emission Unit Portion of FGPPCOATING When Coating of Plastic Business Machine Parts.	The permittee did not keep record in a format acceptable to the AQD district supervisor.	11.96 pounds per gallon of solids applied*	Calendar month	PTI No. 75-04 FGPPCOATING SC 1.1b and 1.11.	Non-compliance
VOCs	Each Individual Emission Unit	The permittee did not keep	2000	Calendar	PTI No. 75-04 FGPPCOATING	Non-

	Portion of FGPPCOATING.	record in a format acceptable to the AQD district supervisor.	pounds	month	SC 1.1c and 1.11.	Compliance
VOCs	Each Individual Emission Unit Portion of FGPPCOATING.	The permittee did not keep record in a format acceptable to the AQD district supervisor.	10.0 tpy	12-month rolling	PTI No. 75-04 FGPPCOATING SC 1.1d and 1.11.	Non-Compliance

Process/Operatic

**Restrictions**

As specified in SC 1.2, at the time of inspection, containers of coatings, reducers, solvents, and thinners were covered. Per SC 1.3, spent filters are taken from machines, inspected for hazardous metals, and then dried for a period of 48 hours before disposal. After the spent filter has been dried, the spent filter is then placed in a containment bag, sealed and disposed of with other commercial refuse in the proper disposal unit. Safety data sheets to ensure compliance and minimization of contaminants are kept on each spray line and filled out for each spent filter.

**Equipment**

As required in SC 1.5, I observed exhaust filters were installed with the paint spray booth portion of FGPPCOATING. These exhaust filters were maintained and operated in a satisfactory manner.

**Recordkeeping /Reporting/Notification**

Per SC 1.9, the permittee maintains a current listing from the manufacturer of the chemical composition of each coating including the weight percent of each component. As specified in SC 1.10, the permittee shall keep the following information on a monthly basis for FGPPCOATING:

Gallons (with water) of each coating used and, if applicable, reclaimed

- a. Gallons (with water) of each coating, reducer, catalyst, additive, purge solvent, and clean-up solvent used
- b. VOC mass emission calculations determining the monthly emission rate in tons per calendar month
- c. 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.
- d. Hours of operation

It seems permittee hasn't used appropriate units (pounds, gallon or tons) for the VOC amount according to permit condition: The permittee did not keep record in a format acceptable to the AQD district supervisor. It is the violation of the SC 1.11 of FGPPCOATING of PTI no. 75-04.

**FGFACILITY**

The following conditions apply to: FGFACILITY

**Emission Limits**

	Pollutant	Equipment	Emissions record from Jan. through Dec. 2019	Limit	Rule/Permit Condition Violated	Compliance
2.1a	EACH INDIVIDUAL HAP	FGFACILITY	Xylene emission was 163 ton	Less than 9.0 tons per year	PTI No. 75-04 FGFACILITY SC 2.1a	No
2.1b	Aggregate HAPs	FGFACILITY	916 tons	Less than 22.5 tons per year	PTI No. 75-04 FGFACILITY SC 2.1b	No

**Recordkeeping / Reporting / Notification**

Per SC 2.4, the permittee shall keep the following information on a monthly basis for FGFACILITY:

- 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 the annual emission rate of each in tons per 12-month rolling time period as determined at the end of each calendar month.

The records shall be kept in a format acceptable to the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **[R336.1205(3)]**

It seems permittee hasn't used appropriate units (pounds, gallon or tons) for the VOC amount according to permit conditions. The permittee did not keep record in a format acceptable to the AQD district supervisor. It is the violation of the SC 2.4 of FGFACILITY of PTI No. 75-04.

Based on the on-site inspection, reviewing records, Conformance Coatings & Prototype is in non-compliance with the requirements of SC 1.1 a, 1.1 b, 1.1 c, 1.1 d, 2.1 a, 2.1 b and 2.4 of PTI No. 75-04. After the inspection day, I made phone call and sent several follow-up emails to Ms. Krystal Douglass, Quality Manager, of CCP and requested the appropriate records. EGLE-AQD has not yet receive the appropriate records per permit conditions as of March 11, 2020. A violation notice will be issued to CCP for this violation.



NAME \_\_\_\_\_

DATE July 8, 2020

SUPERVISOR Joyce [Signature]