

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

N099158536

FACILITY: Wright Coating Technologies		SRN / ID: N0991
LOCATION: 1603 North Pitcher Street, KALAMAZOO		DISTRICT: Kalamazoo
CITY: KALAMAZOO		COUNTY: KALAMAZOO
CONTACT: Jim Grimes , Maintenance Supervisor		ACTIVITY DATE: 05/25/2021
STAFF: Monica Brothers	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: Announced, Scheduled, On-site Inspection		
RESOLVED COMPLAINTS:		

This was an announced, scheduled inspection. Wright Coating Technologies is a facility that coats various metal and plastic parts. Staff (Monica Brothers) arrived on-site at 9:00 am and left at about 11:00 am. Upon arrival, I met with Jim Grimes, the Maintenance Supervisor. Jim had already sent me most of the required records prior to the on-site visit, but we sat down in a conference room to go over some of the recordkeeping and questions I had about them. I also asked him some preliminary questions about the facility before we conducted the walk-through. Jim said that the facility has about 100 workers who work 3 shifts per day, 5 days per week, with the 3rd shift being mostly clean-up work.

They have one small boiler that is used to heat the HCL vat, no emergency generators, and the cold cleaner that was once there is now gone. They currently operate under PTI # 212-16 and also have many exempt processes like a sanding booth, a welding area, HCL tank, a strip tank, and a power washing area. They also have electric ovens and powder-coating processes, which can be considered exempt from permitting under Rule 287(2)(d) for powder-coating and Rule 282(2)(a) for electrically heated ovens. After this opening conference, we took a tour of the facility. The following is a summary of what was observed on the tour with the associated recordkeeping information.

EU-FURNACE:

This furnace is a Pacific Kiln #500 and is natural gas-fired. It was not operating at the time of the inspection, but their permit requires a minimum temperature of 1400F with a 0.30 sec. retention time. Jim said that it usually runs at about 1450F. The stack looked to be the correct height and dimensions, and no visible emissions were observed.

FG-LINES:

This flexible group consists of EU-Line-01, EU-Line-03, EU-Line-04, EU-Line-05, and EU-CleanUpBooth and associated purge and/or clean-up solvents. Their records show that they are keeping track of the gallons of each coating, solvent, and thinner used on each line. During the tour, no visible emissions were seen coming from any of the coating line stacks, and coating containers were covered when not in use. The coating booth filters on all of the coating booths seemed to be installed appropriately and in good condition. Jim said that they get changed multiple times a day. I asked Jim for the Method 24 testing analyses for each coating, but he said that they have not done Method 24 testing and just use the VOC and HAP contents on the SDS sheets. Because they have not gotten prior written approval from EGLE to use manufacturer's formulation data, this is a violation of Condition V.1 in PTI 212-16. A violation notice will be sent for this.

EU-Line-01 is a plastisol coating dip tank line that also has associated preheat and cure ovens that are gas-fired. PTI #212-16 limits EU-Line-01 to 0.7 tpy (12-month rolling) for VOC. Records show that they are consistently below this limit, with 0.24 tpy in July 2019 being the highest value in the past couple of years.

On EU-Line-03, plastisol, with added thinner, is applied using atomized guns, and then the parts are cured on Line 4's cure oven. PTI #212-16 limits EU-Line-03 to 1.4 tpy (12-month rolling) for VOC. Records show that they are consistently below this limit, with 0.047 tpy in March 2019 being the highest value in the past couple of years.

EU-Line-04 consists of a preheat oven and a cure oven, both of which are gas-fired, and a coating booth where either powder-coating can be applied by spray guns or parts can be dipped in plastisol. There is a cyclone and baghouse that vents internally that is used to capture the powder-coating. PTI #212-16 limits EU-Line-04 to 4.93 tpy (12-month rolling) for VOC. Records show that they are consistently below this limit, with 0.0025 tpy in January 2019 being the highest value in the past couple of years.

EU-Line-05 is their solvent coating line, which begins with an alkaline wash, then a rinse and dry. Then the parts are sprayed with either powder-coating, a vinyl or nylon primer, or liquid paint in a 2-part booth. The parts then go to the cure oven, which is gas-fired. MEK is used to flush the lines of the paint guns, and the powder-coating is controlled by a cyclone and baghouse that vents internally. PTI #212-16 limits EU-Line-05 to 13.4 tpy (12-month rolling) for VOC. Records show that they are consistently below this limit, with 5.9 tpy in April 2021 being the highest value in the past couple of years. EU-Line-05 is also limited to 1000 gallons of coating per year (12-month rolling) while coating metal furniture parts and products. They are keeping these records and are under this limit.

EU-CleanUpBooth is a clean-up booth for powder coating. The powder that is reclaimed from the clean booth gets put into drums and is stored until it can be hauled off to a landfill or taken away by another company to be recycled.

FG-FACILITY:

Wright Coating Technologies is an Opt-Out for HAPs. They are limited to 8.9 tons/year for each individual HAP and 22.4 tons/year for all HAPS combined on a 12-month rolling time scale. Their records show that they are keeping track of the usage of each HAP-containing material, the HAP content of each material, and are calculating tons/year for both individual and aggregate HAPS. They are under both 12-month rolling limits, with 13 tpy in April 2021 being the highest aggregate HAPS value in the last 6 years and 7.27 tpy of xylene in April 2021 being the highest individual HAP value in the last 6 years.

Non-Permitted Equipment:

Line #6 and #7:

These lines are not associated with a PTI because they use powder-coating only, which is exempt under Rule 287(2)(d). Particulate emissions from these lines are controlled by cyclones and baghouses.

Steelman Furnace:

This furnace is being operated under the Rule 290 exemption, so they keep records based on their gas usage for the unit. They use EPA emissions factors to calculate the furnace's emissions (VOC, NOx, SO2, CO, and PM10), which are far under the monthly limit of 1000 lbs/month. The unit was not being operated at the time of the inspection.

Other Exempt Equipment:

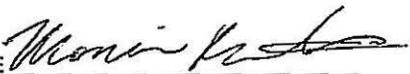
There is a small sanding booth that is used to clean off parts. It vents externally with a filter. The area where it exhausts outside looked clean, so this is considered exempt under Rule 285(2)(l) (vi). There is no longer a cold cleaner at the facility. There is a welding area where they make the racks that the metal parts hang on in the coating booths. This is vented internally and exempt from permitting under Rule 285(2)(i).

They have an HCL tank that was covered and not in use at the time of the inspection. The parts get an alkaline wash, a rinse, a dip in the HCL tank, and then another rinse. They have records to show that they are under 500 lbs/month of emissions, so this can be considered exempt from permitting under Rule 290.

There are two Strip Tanks that vent externally. Per Rule 290, they are allowed 1000 lbs/month VOC emissions. Their records show that they are under this limit.

Near the furnaces, there is also a power-washing area (EUPowerwasher) where parts get power washed with cold water, dipped into a tank of phosphoric acid, and then dipped into an oil rinse. The area looked clean, and the lids were closed on the tanks while not in use, so this process can be considered exempt under Rule 281(2)(e).

In summary, Wright Coating Technologies was not in compliance at the time of inspection. A violation notice will be sent for the lack of Method 24 testing on the coatings. Also, after completing the inspection, I was informed by Krista Hettich from the EGLE Materials Management Division that Wright Coating Technologies told her at a recent inspection that they burn their used coating-booth filters in their burn-off ovens. I confirmed this with Jim Grimes and let him know that this is a violation of PTI # 212-16. A violation notice will be sent for this as well.

NAME DATE 8/24/21SUPERVISOR RIL 8/25/21