

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

N120326670

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| FACILITY: EUGENE WELDING CO | SRN / ID: N1203 |
| LOCATION: 6300 KAREN ST, MARLETTE | DISTRICT: Saginaw Bay |
| CITY: MARLETTE | COUNTY: SANILAC |
| CONTACT: Wes Boyne , Plant Manager | ACTIVITY DATE: 03/07/2014 |
| STAFF: Benjamin Witkopp | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Facility inspection and 2nd round of sampling | |
| RESOLVED COMPLAINTS: | |

On March 7, 2014 Ben Witkopp of the MDEQ-AQD went to meet with Wes Boyne of Eugene Welding. Wes is the Supervisor / Plant Manager of the facility however he was not there and a Supervisor had come up from Marysville as his replacement while he was gone.

The facility operations are covered by permit to install 738-85A. Eugene Welding starts with stock steel components to produce coated racks for storage and display use by customers.

The stock steel is received, cut, and ground to lengths, and assembled on site. The steel goes through an iron phosphate cleaning step prior to being coated. The material used to provide an iron phosphate coating is CrysCoat 2707 FF manufactured by Chemetall. The rinses are water. There are no specific conditions in the permit relating to the acidic phosphate cleaning and coating.

Two manual spray areas are found on the conveyorized line. All filters were in place. Airless spray equipment was being used. The coatings are used as received; no thinners or additives are used. They use water for cleanup. During a very slight lull in the parts to be painted, I went onto the spray deck so a painter could fill two 4 oz bottles per procedure. The paint pressure was turned way down to minimize splatter and the bottles were filled to the top and labeled. I then took the samples to the car to avoid potential breakage. They were running gray water reducible baking enamel at the time. The painters said it was one of their lower volume usage coatings.

The paint samples were sent to Trace Analytical in Muskegon Michigan on March 10, 2014. On April 1, 2014 sample results were provided. Both sample results listed a VOC content of 1.4 # per gallon, minus water. The permit limit is 3.

Records were subsequently requested. The 12 month rolling tons of VOC were 6.12 for April 12014 and the level of pounds of VOC per hour was 14.28. The respective limits are 24.1 tons per 12 month rolling time period and 24.2 pounds per hour.

There weren't any HAPs records as the facility uses only HAPs free coatings. Also, they don't have any cold cleaners / parts washers on site as potential HAP sources.

It should be noted though the facility has a HAPs opt-out permit, in reality it is a true minor (actually a zero) source. This is due to using HAPs free coatings and the lack of other sources of HAPs such as parts cleaners. The presence of the HAPs opt-out limit is protective concerning future MACT standards. Given the lack of HAPs on site in the first place it is felt the area source MACT (HHHHHH) for Paint Stripping and Miscellaneous Surface Coating Operations does not likely apply.

NAME B. WitkoppDATE 8-28-14 SUPERVISOR C. Hale