

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

N241741326

FACILITY: CRAMER TECH COATING INC		SRN / ID: N2417
LOCATION: 6055 JACKSON RD, DEXTER		DISTRICT: Jackson
CITY: DEXTER		COUNTY: WASHTENAW
CONTACT: Paul Cramer , President/Owner		ACTIVITY DATE: 08/31/2017
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection of a facility with a paint booth.		
RESOLVED COMPLAINTS:		

Minor Source-**Facility Contacts**

Paul Cramer-President/Owner

Ph 734-662-9315

Website: www.cramertechcoating.com**Purpose**

On August 31, 2017, I conducted an unannounced compliance inspection of Cramer Tech Coating, Inc. LLC (Company) located near Ann Arbor, Michigan in Washtenaw County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules and their Permit to Install (PTI) # 75-90.

Facility Location

The facility is located in a commercial business area just west of Ann Arbor. See attached aerial photo.

Facility Background

The facility was last inspected in 2008. Some recordkeeping violations were found.

Regulatory Applicability

PTI 75-90 covers one paint booth at the facility that is used to coat miscellaneous metal parts.

Arrival & Facility Contact

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at 9:10 am, proceeded to the facility office to request access for an inspection, provided my identification and spoke with Paul Cramer(PC)-President/Owner of the facility. I informed him of my intent to conduct a facility inspection and to review the various records as necessary.

PC extended his full cooperation and fully addressed my questions during the inspection.

Pre-Inspection Meeting

PC outlined that the facility has 4 employees and operates during normal business hours.

They still have one conventional paint booth, one powder coat booth with an associated drying oven and one phosphate parts cleaning room/booth (like a paint booth) where parts are manually power washed.

PC showed me the paint records he keeps. Records date back to 2008. He keeps daily records paint usage in type of paint and ounces used. It appears that the Company is using less 5 gallons per month. See Attachment (1) which includes paint records for 2017. It appears that they are using the same type of high VOC coating types that was described in the 2008 report.

I pointed out to him that Rule 287 permit exemption applies to his operation and suggested he consider having his PTI voided.

Onsite Inspection

PC gave me a tour of the facility.

He showed me the phosphate parts cleaning room/booth. See attached photo. There is an exhaust fan on the wall this discharges into a vertical stack on the roof. I asked PC why the fan is necessary for this room. He indicated that the phosphate solution is at 130 deg F. and the room gets very warm and humid when an operator is power washing so mostly just for the comfort of the employee. A check of material safety data sheets shows that one of the chemicals in the power wash solution contains up to a few percent of phosphoric acid. It appears that the solution is probably barely acidic and doesn't appear to represent a potential problem with exhaust emissions. Also, the room where the power washing takes place is open and the exhaust fan isn't really a dedicated exhaust system so no issues regarding potential PTI applicability.

PC showed me the paint booth where metal parts are spray painted. See attached photo. The paint filter appeared to be okay shape. PC indicated that they change out the filter a couple of times a year.

PC showed me the powder paint booth. See attached photo. (PTI exempt per Rule 287 (2) (d).) PC indicated that most of business is now from powder coating.

PC showed me the natural gas oven dryer associated with the power paint booth. See attached photo.

Recordkeeping/Permit Requirements Review

See Attachment (1) for coating usage records. MSDS's for the coatings were not reviewed since they appeared to be same coatings that were outlined in the 2008 inspection report and due to the very low coating usage rate.

PTI No. 75-90 covers a large coating spray booth for miscellaneous metal parts. Painting was not taking place during the inspection. The filters were observed to be in-place and in good condition. The PTI contains:

Sp. Condition 14. requires VOC limits of 7.9 pounds per hour, 900 pounds per month, and 10 tons per year. - SEE Sp.C.17

Sp. Conditions 15 & 16 are no Visible emissions and may be required to conduct testing. – **Compliant.**

Sp. Condition 17. Monthly paint and solvent records need to be kept. -**Compliant.**

Sp. Condition 18. Dry filters have to be installed and operating properly. – **Compliant.**

Sp. Condition 19. Proper disposal of wastes - **Appears to be compliant.**

Sp. Condition 20. Stack parameters – **Compliant.**

Sp. Condition 21. Permit evaluation identifies Polane (Sherwin Williams) as supplier which is the same as current. - **Appears to be compliant.**

Post-Inspection Meeting

I held a brief post-inspection meeting with PC. I indicated that I would be following up with email to ask PC if he would like to have his PTI voided since the Company is well under the 200 gallons per month of coating usage and is already keeping the necessary records to comply with the permit exemption. I told him that I had no other issues. I thanked PC for their time and cooperation, and I departed the facility at approximately 9:30 am.

Compliance Summary

The Company is in compliance with their air permit.

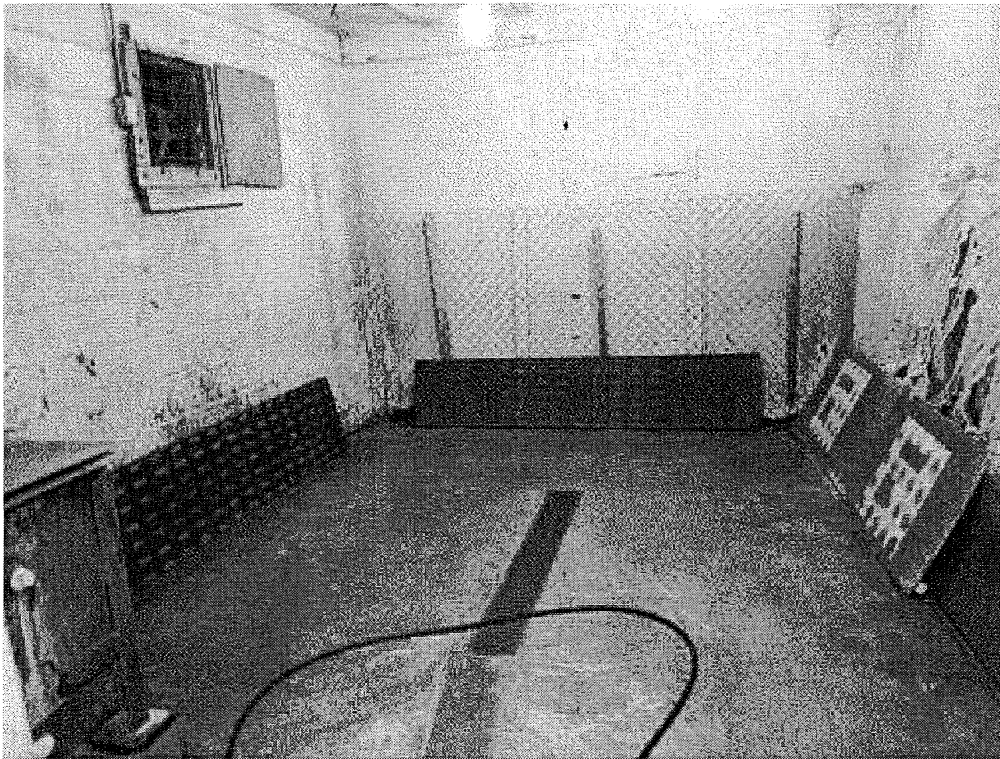


Image 1(Power washer room) : Power washer room with wall exhaust.

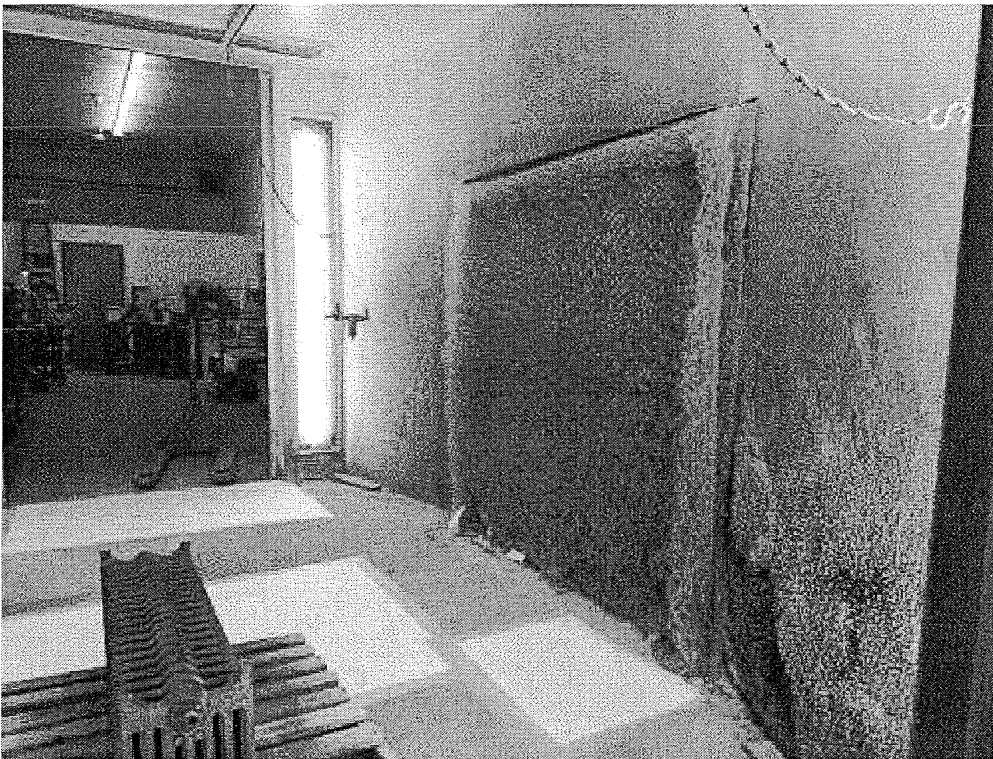


Image 2(Paint booth) : Paint booth for misc. metal parts.



Image 3(Powder coating) : Powder coating booth.



Image 4(Drying oven) : Drying oven for powder coating booth.



Image 5(Aerial photo) : Aerial photo.

NAME M. Kovalchuk

DATE 9/1/2017

SUPERVISOR [Signature]