

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

N249758599

<b>FACILITY:</b> MARCH COATINGS ventures llc		<b>SRN / ID:</b> N2497
<b>LOCATION:</b> 160 SUMMIT, BRIGHTON		<b>DISTRICT:</b> Lansing
<b>CITY:</b> BRIGHTON		<b>COUNTY:</b> LIVINGSTON
<b>CONTACT:</b> Mark Tomasik , VP of QA and E, H & S		<b>ACTIVITY DATE:</b> 05/20/2021
<b>STAFF:</b> Samantha Davis	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> Announced, scheduled inspection as part of an FCE.		
<b>RESOLVED COMPLAINTS:</b>		

**5/20/2021****March Coatings Ventures N2497**

Mark Tomasik, EHS , 810-229-6464 x 221, [mtomasik@marchcoatings.com](mailto:mtomasik@marchcoatings.com)

March Coatings is a facility that specializes in coatings and paint for automotive parts including brake rotos, frame components, and seat components.

The facility has approximately 38 employees and operate Monday through Friday, and the occasional Saturday from 6:30am until 4:45pm.

This was an announced, scheduled inspection to determine compliance at the with the associated permits. Inspections have been announced due to the recent COVID-19 pandemic. There were no visible emissions or odors upon my arrival.

March Coatings has two SRNs for two different plants:

March Coatings Plant 1: N2497 – Permit to Install (PTI) Numbers 80-03, 348-01, and 427-90A

March Coatings Plant 2: N5339 – PTI Numbers 359-00 and 461-94A

In March of 2020 March Coatings became March Coatings Ventures started leasing out Plant 2 to another company and all equipment associated with March Coatings was dismantled. Therefore, I have put in a request to void PTI Numbers 359-00 and 461-94A.

PTI 427-90A is an opt-out permit for HAPs for the use of a couple paint lines.

None of these lines were operating during my inspection.

FGCOATING consists of:

EULINE1 is a robotic spray but has not been ran in about a week due to the global chip shortage. It is equipped with dry filters. The filters are replaced approximately once per week or as needed.

EULINE2 is the rotor line. It is a spray booth equipped with dry filters and sixteen automatic HVLP spray guns. This line has not been operated in about a year and a half. It is the backup line.

EULINE3 is the muffler line. This is also a spray booth equipped with dry filters and sixteen automatic HVLP spray guns.

**VOC limit for FGCOATING is 30.1 tpy on a 12-month rolling basis.**

**I received records for May 2020 through April of 2021. The records for Line 1 indicate 0.92 tons, Line 2 has not ran so that is 0 tons, and Line 3 records indicate 0.2 tons. These are well below the Emission Limit in the permit.**

**Material Limit is 3.5 lb/gal of VOCs. Records provided to me indicate that the coating used for Line 1 is 2.9-3.0 lb/gal of VOC and Line 3 is 2.8 lb/gal. The facility uses 3.5 lb/gal to calculate potential to emit.**

**Waste material is kept in closed containers, and filters appeared to be installed properly. Used filters are hauled out by a waste company.**

**There is a hazardous air pollution (HAP) limit in the permit of 9 tpy of individual HAPs. According to Mark and the records provided there are no HAPs in the coatings. Lines are purged with water.**

**Stacks observed outside appear to meet the height requirement in the permit.**

**There are currently no test caps on site for the HPLV spray guns. These are required by a condition in the permit. This was listed in the previous inspection report as well. Mark ensured me they would secure some test caps for the process.**

**PTI 348-01 a general permit for the 4" e-coat line, which is a dip process for parts.**

**This line was operating during my inspection.**

**This line is used for coating frame, suspension, and seat components. The process has 10 stages: spray cleaner, immersion cleaner, city water rinse, conditioning rinse, zinc phosphate (used to help the coating stick to the surface), city water rinse, soft water rinse which is water run through reverse osmosis (RO) which is then followed by RO spray, e-coat tank, spray rinse with RO water, and final dip rinse. From there, the parts go into phase one of the oven for a flash cure and then through phase two of the oven for curing.**

**VOC limit for FGCOATING is 10 tpy.**

**I received records for May 2020 through April of 2021. The records indicate the total for the year is 0.93 tons of VOC for the year.**

**Permit has multiple conditions related to a thermal oxidizer that do not apply because there is not thermal oxidizer installed at the facility.**

**Stacks observed outside appear to meet the height requirement in the permit.**

**PTI 80-03 is for a fluid bed cleaning furnace for removal of coating residues from metal parts.**

**This unit has a natural gas furnace afterburner zone and a cyclone separator for emission control. Any particulate drops down from the separator into a bin, which is then reused in the unit. This unit is used to removed cured coatings from metal parts. It uses a silica substance to remove**

residues from parts. It heats the parts to about 900 degrees F and the afterburner is heated to around 1300 degrees F, the exhaust gasses are then drawn through the cyclone and particulate matter drops down before exhaust gasses are released through the stack.

The device cleans paint off from metal dip line racks associated with PTI 348-01.

This unit was not operating during my inspection; therefore, no visible emissions were observed from the stack. Afterburner temperature is to be maintained at a minimum of 1100 degrees F as required by the permit. Previous inspection noted a violation for not having a temperature recording device installed. I have observed that there is now a temperature device installed.

Permit requires calibration of the temperature thermocouples at least once per year. Calibration report was provided to me during the inspection which listed the last calibration was performed in October of 2020.

Stacks observed outside appear to meet the height requirement in the permit.

Based on my inspection it appears that March Coatings is in compliance with PTI Numbers 80-03, 348-01, and 427-90A.

NAME *Samantha Davis*

DATE 6/23/2021

SUPERVISOR *B.M.*