

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Self Initiated Inspection

N265835820

FACILITY: Kevlar Coating LLC		SRN / ID: N2658
LOCATION: 15960, ROSEVILLE		DISTRICT: Southeast Michigan
CITY: ROSEVILLE		COUNTY: MACOMB
CONTACT: Kasey Tomkiewicz, Owner/Operator		ACTIVITY DATE: 07/29/2016
STAFF: Tyler Salamasick	COMPLIANCE STATUS: Compliance	SOURCE CLASS: Minor
SUBJECT: Verification of closed permit and new facility inspection		
RESOLVED COMPLAINTS:		

Background

Kevlar Coatings, LLC (Kevlar or the facility) SRN: N2658 is a metal coating and painting facility located at 15960 Common Road, Roseville Michigan. The manufacturing facility was inspected on Friday 7/29/2016 by Tyler Salamasick of the Michigan Department of Environmental Quality, Air Quality Division. The intent of the inspecting was to determine compliance with the Federal Clean Air Act Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act of 1994, PA 451, as amended, and Michigan's Air Pollution Control Rules. Kevlar is located at the former Jefferson Plastic Company which had its paint booth permits No. 11-90, voided in 1997.

The site contact is the Owner/Operator, Kasey Tomkiewicz. Kasey joined me in both the inspection as well as reviewing records.

Inspection

Site arrival was at 2:00 pm Friday afternoon. Kevlar Coating, LLC is located in a primarily industrial/residential area with the nearest residential structure approximately 430ft north of the facility. Upon arrival, it appeared that there was not anyone on site. I asked the neighbor to the east of the facility if anyone was operating next door. He informed me that there was a painting shop located at 15960 Common Road. When I left the neighboring facility I notice that a vehicle had arrived at the facility. When I went over to Kevlar I was greeted by Kasey Tomkiewicz. Upon meeting I informed Kasey that I was conducting an inspection to confirm Jefferson Plastic Company no longer operated at the location as well as to determine compliance of new facilities. Kasey agreed to tell me about his company and informed me that Kevlar currently has 3 employees and that their operating hours vary depending on work demand. Kasey also informed me that he had just recently (this spring) moved into the facility and that the previous tenant also did surface coating and painting. They are currently spraying military parts. While near the acid tanks I noticed the west wall had totes filled with unknown chemicals. There were approximately 10 totes stacked against the wall. Kasey told me that the previous tenant had abandoned them. He also said that he looked into having the totes tested and removed and the company he spoke to estimates the cost to be approximately \$20,000. Kasey further informed me that the previous tenant told him not to worry about having waste hauled off because it could be poured down the drain. Remediation and Redevelopment (RRD), The Office of Waste Management and Radiological Protection (OWMRP) and The Water Resources Division (WRD) have been informed of the previous tenant's alleged actions. After looking at the totes Kasey showed me the rest of the facility. The facility has one Zinc Acid Phosphate line (ZAP) and one paint spray booth. The ZAP process is only emitted to the in plant environment. This appears to be permit exempt pursuant to **R 336.1285(r)** which in part states;

...(r) Equipment used for any of the following metal treatment processes if the process emissions are only released into the general in-plant environment:

- (i) Surface treatment.
- (ii) Pickling.
- (iii) Acid dipping.
- (iv) Cleaning.
- (v) Etching.

(vi) Electropolishing.

(vii) Electrolytic stripping or electrolytic plating....

The spray booth appeared to have properly installed and maintained filters. They appeared to be clean and freshly installed. I informed Kasey that he should keep records of when he replaced the filters as well as this monthly paint use in order to use the R 336.1287(c) permit exemption. On 8/4/2016 Kasey provided the AQD with safety data sheets of the paints he uses at the facility. He also informed me that they estimate using approximately 20 gallons of paint last month. If this is correct the process would appear to be permit exempt pursuant to R 336.1287(c) which in part states

...(c) A surface coating line if all of the following conditions are met:

(i) The coating use rate is not more than 200 gallons, as applied, minus water, per month.

(ii) Any exhaust system that serves only coating spray equipment is supplied with a properly installed and operating particulate control system.

(iii) Monthly coating use records are maintained on file for the most recent 2-year period and are made available to the air quality division upon request....

I suggested that Kasey contact The Office of Environmental Assistance (OEA) in order to help him come into compliance with the other MDEQ division.

Conclusion

It appears that the facility is in compliance with Michigan Air Quality Rules and Regulations through the use of permit exemption R 336.1287(c) and R 336.1287(r). It is recommended that RRD, OWMRP and WRD perform further investigations.

NAME [Signature]

DATE 8/5/16

SUPERVISOR CJE

PAINT LIST

#1 White

- MIL-PRF-22750 Type II
- #17925

#2 Exterior Tan

- MIL-DTL-53030 Type I
- 686 #33446

#3 Interior Tan

- MIL-PRF-22750 Type II
- FS-595c-23448

#4 Semi Gloss Black

- MIL-PRF-22750 Type II
- #27038

#5 High Gloss Black

- MIL-PRF-22750 Type II
- #17038

#6 Green

- MIL-DTL-53039 Type IX
- 383 #34094

#7 Green (waterborne)

- MIL-DTL-64159 Type II
- 383 #34094

#8 Primer

- MIL-DTL-53022 Type II

#9 Wash Primer

- QAP701 Component A
- QAP702 Component B

