

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

N356736163

FACILITY: DEPARTMENT OF MILITARY AFFAIRS		SRN / ID: N3567
LOCATION: 10602 EATON HWY, GRAND LEDGE		DISTRICT: Lansing
CITY: GRAND LEDGE		COUNTY: EATON
CONTACT: Randy Bebee, Aircraft Electronics Supervisor		ACTIVITY DATE: 08/25/2016
STAFF: Michelle Luplow	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Unannounced, scheduled compliance inspection to determine compliance with PTI No. 874-92.		
RESOLVED COMPLAINTS:		

Inspected by: Michelle Luplow

Personnel Present: Steven Foster, Randy Foreback

Other Personnel: Randy Bebee, Aircraft Electronics Supervisor (Randolph.s.beebe.mil@mail.mil)

Purpose: Conduct an unannounced, scheduled compliance inspection by determining the Department of Military Affairs' (Army National Guard) compliance with Michigan Air Pollution Control Rules and PTI No. 874-92 for a paint booth. There are no records indicating that this facility has been inspected in the past.

Facility Background/Regulatory Overview: Steven Foster said that the Army Aviation Support Facility is a maintenance facility for helicopters and is also where they conduct helicopter training, test flying and efficiency flights for the army.

Inspection: On August 25, 2016 at approximately 12:30 p.m., I arrived at the entrance of the National Guard where a security officer contacted Randy Foreback for me. I was instructed to drive to the west-most building of the facility where I met R. Foreback. He proceeded to get me into contact with Steven Foster, as Randy Bebee, who is in charge of facility maintenance, was not in that day. I provided S. Foster with a copy of PTI No 874-92, a permit to install exemptions handbook (July 2014), and a DEQ Environmental Inspections Rights and Responsibilities brochure. He said he would provide this to R. Bebee upon his return. S. Foster proceeded to provide me with a tour of the facility.

The following table contains all permitted and exempt equipment that I observed at the facility.

Equipment	PTI/Exemption	Regulatory Notes
Paint booth	874-92	
6 BMK 2.0 Natural gas-fired hot water boilers; 1,720,000 Btu/hr each	Exemption Rule 282(b)(i)	Exempt from a PTI because each is less than 50 MMBtu/hr fired on sweet natural gas; Exempt from Boiler MACT for area sources: gas-fired boilers
Detroit Diesel Emergency Engine: 665 HP; installed in 2006; manufactured November 2005; 400 kW; 969,500 Btu/hr; diesel-fueled; 445 hours on it	Exemption Rule 285(g)	Exempt from a PTI because less than 10 MMBtu/hr. Determination of whether this engine is subject to an engine MACT or NSPS standard is TBD
Cold Cleaner; located in hangar floor room	Exemption Rule 281(h)	Exempt from a PTI because surface area (air:vapor interface) is less than 10 ft ² . Lid was closed, operating instructions posted.
Cold Cleaner; located in hangar floor room	Exemption Rule 281(h)	Exempt from a PTI because surface area (air:vapor interface) is less than 10 ft ² . Lid was closed, operating instructions posted.
Cold Cleaner; located in paint booth room	Exemption Rule 281(h)	Exempt from a PTI because surface area (air:vapor interface) is less than 10 ft ² . Lid was closed, operating instructions posted.

PTI No 874-92: Paint booth

S. Foster said that this paint booth is used to paint helicopter components, such as air frame parts. S. Foster said they had used the booth that morning. The permit requires that all exhaust filters inside the booth be installed and operating properly. The booth was not being used during the inspection, but I verified that the exhaust filters were all installed properly.

The National Guard is required to keep monthly usage rate and VOC content data for each coating used in order to determine if they meet the 1.9 tons per year limit on VOC. The National Guard is aware of exemption Rule 287(c) for coating lines, as the exemption rule was posted just outside the door to their paint booth.

R. Bebee via email said that they do not currently keep records for paint usage because their environmental office said that it was not necessary due to the small amount of paint they used. I informed R. Bebee that paint use records are required to be recorded per PTI 874-92, but also for exemption Rule 287(c) (limit of 200 gallons of coating per month, minus water) if they choose to void their permit and operate under the exemption. He replied saying that they would start tracking paint usage again. He said that they spray on average less than a ½ gallon of coating per month and that the most they have ever sprayed in one month was 3.1 gallons, as they had a one-time special project to repaint all of their tugs. He provided me with SDS sheets for 4 of their most-used coatings. The coating with the highest VOC content (minus water and exempt solvents), MIL-PRF-23377K Type I Chromated Epoxy Polyamide Primer, was 2.70 lbs/gal. On a worst-case basis, assuming that the Army National Guard used 3.1 gallons per month, using their highest VOC content coating at 2.70 lb/gal for an entire year this would yield ~ 100 lbs of VOC. Based on the worst-case scenario, the Army National Guard is in compliance with their VOC limit of 1.9 tons/year.

R. Bebee said he would inform me when their environmental office has made a decision to either void PTI 874-92 and operate under exemption Rule 287(c), or continue to operate under their PTI.

Compliance Statement: At this time the Army National Guard Aviation Support Facility is in compliance with PTI 874-92 and the state rules for cold cleaners and exempt equipment.

NAME M. M. Low

DATE 9/30/16

SUPERVISOR B. M.