

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

N509455264

<b>FACILITY:</b> WOODSPECS INC		<b>SRN / ID:</b> N5094
<b>LOCATION:</b> 2240 SCOTT LAKE RD, WATERFORD		<b>DISTRICT:</b> Warren
<b>CITY:</b> WATERFORD		<b>COUNTY:</b> OAKLAND
<b>CONTACT:</b> Andy Thome , Operations Manager		<b>ACTIVITY DATE:</b> 07/09/2020
<b>STAFF:</b> Joe Forth	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> On-site and virtual inspection.		
<b>RESOLVED COMPLAINTS:</b>		

On August 28, 2020, AQD staff Joseph Forth conducted a scheduled inspection of Woodspecs, Inc. (N5094) located at 2240 Scott Lake Road, Waterford, MI. The purpose of this inspection was to determine the facility's compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules, and Permit to Install (PTI) No. 165-00.

I initially conducted the inspection virtually on July 9, 2020. The records were provided to the AQD on July 23, 2020. I then completed the inspection on August 28, 2020 in person to inspect the dry filters for the booths.

Woodspecs is a Tier II supplier of primed plastic parts such as bumpers to the automotive industry. Priming occurs at the facility. According to Mr. Thome, Woodspecs currently has 12-18 employees and operates from 7:00 am to 3:30 pm Monday through Friday.

#### **EU-SPECIALTYBOOTH**

The specialty booth is used for specialty projects such as those requiring high-gloss paint. This booth was not operating during the inspection. The booth has a high-volume low-pressure (HVLP) applicator and is a combined paint booth and oven. The oven operates at about 180°F and is natural-gas fired. A downdraft controls air emissions. Incoming air passes through a mesh filter in the ceiling and ambient emissions are controlled by a fiberglass filter in the paint booth floor. Both fiberglass and mesh filters were in place and appeared to be operating properly. Filters are replaced every few weeks based upon static pressure readings.

#### **EU-MAINLINE**

The main line is a conveyerized paint line consisting of four HVLP applicator booths back to back so parts can be coated on either side. Filters are set up in two layers; mesh filters were in place with polyester pads behind. Filters appeared to be operating properly. Filters are replaced daily or as needed according to Mr. Thome. Before being coated, parts pass through a dry-off oven. After coating, parts travel through a bake oven with temperatures ranging from 150-250°F. Both the dry-off and bake ovens are included in PTI No. 165-00.

#### **EU-IRLINE**

The infrared line was operating during the inspection. It consists of two HVLP applicator paint booths back-to-back with mesh filters in front of polyester filters. Filters are replaced as needed and appear to be operating properly. The infrared line is conveyerized. Parts travel through an electric convection oven operating at approximately 150°F. This oven is included in PTI No. 165-00. During the inspection, I asked Mr. Thome to collect a sample of DuPont Air Dry as applied. Mr. Thome collected a sample for analysis and provided the MSDS for the coating.

#### **EU-COLORBOOTH**

The color booth is a batch booth where colors are mixed and tested in small samples before full-scale batches are made. A computer system provides a color code, like a recipe, to produce a desired color. There is no oven or HVLP applicator associated with this booth. Filters appear to be operating properly.

#### **EU-BATCHBOOTH**

When needed, any booth from other coating lines at the facility with an HVLP applicator serves as the batch booth. During the inspection, a table for the batch booth was set up at the same booth as the

infrared line. The batch booth was not operating during the inspection. Coated parts are cured in a natural gas oven that operates typically around 170-180 °F. This oven is included in PTI No. 165-00.

### Mixing Room

Inside the mixing room, surface coatings are stored and mixed into their designated ratios according to manufacturer-specified guidelines. Lids were closed on all coating containers. A cold-cleaner with an air/vapor interface less than 10 square feet was closed. The cold-cleaner had a copy of the AQD proper operation directions posted clearly on the equipment. The cold cleaner appears to be exempt from permitting requirements via R 281(2)(h).

### Waste Disposal

Outside of the mixing room, waste materials are stored in drums that are picked up by a hazardous waste disposal company.

### Compliance

All records were provided electronically and can be located in: S:\Air Quality Division\STAFF\Joe Forth\N5094 Woodspecs FY20 Inspection

PTI No. 165-00

### FG-SPRAYBOOTHS (FG-SB)

1. The total volatile organic compound (VOC) emission rate from FG-SB shall not exceed 35.3 pounds per hour nor 29.0 tons per year, based upon a 12-month rolling time period as determined at the end of each calendar month. The 12-month rolling time period VOC total from July 2019 through June 2020 is 0.936 tons. The per hour VOC emission rate for the same time frame is 0.9 pounds per hour.
2. The hazardous air pollutant (HAP) emissions, as defined pursuant to Section 112(b) of the Clean Air Act, shall be less than 9.0 tons per year for any individual HAP and 22.5 tons per year for any combination of HAPs at this stationary source. The annual limit shall be based upon a 12-month rolling time period as determined at the end of each calendar month. The 12-month rolling time period HAP total from July 2019 through June 2020 is 0.750 tons. The highest individual HAP during the same time frame was Xylene at 0.246 tons.
3. The applicant shall keep a record, for each calendar month, of the following information for FG-SB:
  - a) Daily hours of operation. The facility operates the booths along with facility hours of operation; 7:00 am – 3:30 pm.
  - b) Daily for each coating, reducer, and solvent used:
    1. The amount used in gallons (with water), and
    2. The VOC content in pounds per gallon (with water) as applied.The permittee provided the usage and the VOC content of each material used in FG-SB.
  - c) Monthly VOC emissions calculations, determining the total mass emissions from the emission unit in pounds per month and a 12-month rolling average mass emissions at the end of each calendar month in tons per year. The permittee provided both monthly and 12-month rolling time period VOC emission calculations.
4. The applicant shall keep a record, for each calendar month, of the following information for the stationary source:
  - a. Daily for each coating, reducer, and solvent used:
    1. The amount used in gallons of each material, and
    2. The HAP content, in pounds per gallon, of each material.
  - b) Individual and aggregate HAP emission calculations, determining the monthly emission rate in pounds per month and a 12-month rolling average mass HAP emissions at the end of each

calendar month in tons per year.

The facility provided usage, HAP content, and monthly and 12-month rolling time period HAP calculations for both individual and total HAPs.

5. The applicant shall not operate the spray booth portions of EU-MAINLINE, EU-IRLINE, EU-COLORBOOTH, EU-SPECIALTYBOOTH, and EU-BATCHBOOTH unless their respective exhaust filters are in place and operating properly. At the time of inspection, each booth appeared to have properly installed air filters. Mr. Thome stated that the filters are replaced depending on production volume, up to once a day.
6. The applicant shall equip and maintain the spray booth portions of EU-MAINLINE, EU-IRLINE, EU-SPECIALTYBOOTH, and EU-BATCHBOOTH with high volume low pressure (HVLP) spray guns or equivalent technology with comparable transfer efficiency. All booth applicators are high volume low pressure.
7. The VOC content of any coating as applied and as received shall be determined using federal Reference Test Method 24. Upon prior approval of the District Supervisor, Air Quality Division, VOC content may alternatively be determined from manufacturer's formulation data. AQD sent a conditional approval letter to Woodspecs on April 21, 2015 to use manufacturer's formulation data in lieu of Method 24. The conditional approval requires at least one sample be tested annually using Method 24. The conditional approval has a sunset date of December 31, 2020 and rescinds March 17, 2010 approval. Mr. Thome provided the most recent Method 24 analysis.
8. The applicant shall maintain a current listing from the manufacturer, of the chemical composition of each coating, reducer, cleanup solvent, etc., including the weight percent of each component. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both. The permittee keeps SDSs, formulation data, or Method 24 analysis of all materials used in FG-SB on site. AQD received information for a representative few electronically, including the most recent Method 24 analysis.
9. The exhaust gases from FG-SB shall be discharged unobstructed vertically upwards to the ambient air from stacks. Stack parameters not verified during the inspection, but all stacks appeared to be unobstructed.
10. The disposal of waste coatings, solvents, and exhaust filters shall be performed in a manner which minimizes the introduction of air contaminants to the outer air. The permittee keeps all waste materials in air tight containers until ready to be removed from the facility by a waste disposal company.

#### Conclusion

Based on the inspection, Woodspecs Inc. appears to be in compliance with the requirements of the Federal Clean Air Act; Article II, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the administrative rules, and Permit to Install (PTI) No. 165-00.

NAME *Joseph M. Furr*

DATE 9-28-20

SUPERVISOR *Sebastian Kallumkal*