

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

N526650306

FACILITY: NOR COTE, INC.		SRN / ID: N5266
LOCATION: 11425 TIMKEN, WARREN		DISTRICT: Southeast Michigan
CITY: WARREN		COUNTY: MACOMB
CONTACT: Cecil Black, Vice President and General Manager		ACTIVITY DATE: 08/13/2019
STAFF: Kaitlyn Leffert	COMPLIANCE STATUS: Compliance	SOURCE CLASS: SM OPT OUT
SUBJECT: FY2019 Scheduled Inspection		
RESOLVED COMPLAINTS:		

On August 13, 2019, I conducted a scheduled inspection of Nor-Cote, Inc, located at 11425 Timken Ave, Warren, Michigan. Nor-Cote has a synthetic minor hazardous air pollutant (HAP) opt-out permit (PTI No. 350-94B) and a general permit to operate a surface coating line (PTI No. 97-06). The purpose of the inspection was to determine compliance with 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); our administrative rules; and Permits to Install Numbers 350-94B and 97-06.

I arrived at the facility and was greeted by Cecil Black, Vice President and General Manager, Nor-Cote. I provided my credentials and explained the purpose of my visit and provided an overview of everything I would like to see while there. We first went over the recordkeeping and then conducted a facility walk-through.

Records

Coating Operations (PTI No. 97-06)

PTI No. 97-06 FG-COATING S.C. VI.3 requires Nor-Cote to maintain records of the purchase orders for all coatings, VOC content of each coating used, gallons of coating used and reclaimed, monthly VOC emission calculations, and 12-month rolling VOC calculations for the coating line. FG-FACILITY S.C. VI.1 also requires that monthly and annual VOC emission calculation records be maintained for the whole facility. The purchase orders were available during the inspection and the remainder of the records were provided via email following my visit.

Mr. Black informed me that the majority of coating applied is gray primer. Other colors or types of coatings are used upon customer request. The provided purchase orders confirm that gray primer is the main coating used at the facility. Manufacturers information on the chemical composition of the gray primer was provided, as required by FG-COATING S.C. VI.4. The product data sheet for the gray primer is attached.

A summary of VOC emissions calculations is attached to this report. The permit limits VOC emissions from the coating operations to 2,000 pounds per month and 10 tons per year, on a 12-month rolling average basis. Facility-wide VOC emissions are limited to 30 tpy. Based on the records provided by Nor-Cote, VOC emissions are below all permitted limits. The highest monthly VOC emissions from the coating line occurred in February, at 939.29 lbs. Rolling 12-month average VOC emissions for the period ending in July 2019 was 3.8 tpy for the coating operations alone and 4.9 tpy for the entire facility.

Facility-Wide HAP Emissions (PTI No. 350-94B)

PTI-350 94B S.C. I. 1 and 2 limit annual emissions of each individual HAP to 8.9tpy and emissions of aggregate HAPs to 22.0 tpy. Compliance with these limits is based on a 12-month rolling average, calculated based on records of HAP containing material usage. S.C. VI. 2 requires the facility to keep records of gallons or pounds of each HAP containing material used, gallons or pounds of HAP containing material reclaimed, HAP content of each material, monthly HAP emissions calculations, and rolling 12-month HAP emission calculations. Mr. Black did not have these records readily available on the day of the inspection but was able to follow up in a timely manner to provide all required records. Emission records were provided through July 2019, which satisfies S.C. VI.1. A copy of the HAP emission summary is attached to this report.

Based on the records provided, the xylene emissions were consistently the HAP with the highest 12-month rolling average emissions. Annual xylene emissions in the period ending in July 2019 were 1.9 tpy. Aggregate HAP emissions over the 12-month period ending in July 2019 were 3.5 tpy. These emission rates are consistent with rolling 12-month emission calculations over the previous year and are well below the permitted limits.

Inspection

The primary activity at Nor-Cote is heat treating steel and aluminum products. The facility operates multiple furnaces, which range in size to handle the varying sizes of metal products being heated treated. Many of the metal products that are stress-relieved at the facility are used in automotive manufacturing.

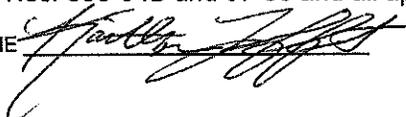
The facility is permitted to operate four grit-blasting operations, which are used to smooth the metal surfaces following the annealing process. Two of the grit blasters were in operation while I was there, and the others were in-between batches. PTI No. 350-94B sets particulate matter (PM) emission limits and visible emissions limits for the four grit blasting units. Compliance with these emission limits is based on proper operation and maintenance of the dust collector control.

We went outside to observe the dust collector associated with the grit blasting operations. I did not observe any visible emissions coming from the dust collector or the stack. I noted that the area around the dust collector was clean and that there was not any fugitive dust or fallout. Mr. Black explained that the collected dust is regularly discharged into bins that are then sealed until being hauled off for disposal. I noted that there were sealed bins being stored near the baghouse. The filters in the baghouse are replaced every three years and were most recently replaced last year.

Following grit blasting, parts may then be coated, depending on customer specification. The facility operates two spray coating booths at the facility. The booths are lined with filter media to control particulate emissions. Neither of the coating booths were in operation during my inspection. The filters in one of the booths were in the process of being replaced while I was on-site. According to Mr. Black, coating operations have decreased. Many customers apply their own coatings to the final products and therefore do not require Nor-Cote to pre-coat the metal parts.

Conclusion

Based on my inspection and review of the provided records, Nor-Cote, Inc is in compliance with all conditions of PTI Nos. 350-94B and 97-06 and all applicable air quality rules and regulations.

NAME  DATE 9/24/19 SUPERVISOR S/S