

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

N661152588

<b>FACILITY:</b> Depor Industries		<b>SRN / ID:</b> N6611
<b>LOCATION:</b> 14830 E 23 Mile Rd, SHELBY TWP		<b>DISTRICT:</b> Southeast Michigan
<b>CITY:</b> SHELBY TWP		<b>COUNTY:</b> MACOMB
<b>CONTACT:</b> Lisa Chehab Manelski , EH&S Coordinator		<b>ACTIVITY DATE:</b> 02/28/2020
<b>STAFF:</b> Kaitlyn Leffert	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> SM OPT OUT
<b>SUBJECT:</b> FY2020 Scheduled Inspection		
<b>RESOLVED COMPLAINTS:</b>		

On February 28, 2020, I, Kaitlyn Leffert, Michigan Department of Environment, Great Lakes, and Energy (EGLE) Air Quality Division (AQD) staff, conducted a scheduled inspection of Depor Industries, located at 14830 23 Mile Road, Shelby Township, Michigan. The facility is identified by the Source Registration Number (SRN) of N6611. 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); AQD administrative rules; and Permit to Install (PTI) Number 43-99G.

Depor Industries coats metal and plastic parts for use in the automotive industry. The facility is permitted to operate five dip spin coating lines, a phosphate pre-treatment line, three grit blast cabinets, and a bowl blaster. The three dip spin coating lines are controlled by a regenerative thermal oxidizer (RTO). Depor has a facility-wide opt-out permit for HAPs.

I arrived at the facility at approximately 10:00 am and was greeted by Lisa Manelski, Office Manager and Customer Service Representative, Depor Industries. Ms. Manelski also handles environmental compliance for the facility and assisted me during the inspection. At the beginning of the inspection, we also spoke via phone with Ted Howard, General Manager for both the Shelby Township and Troy facilities. I explained the purpose of my inspection and went over the required recordkeeping with both Ms. Manelski and Mr. Howard. I then conducted a walk-through of the facility with Ms. Manelski.

Depor also has a permit to operate a burn-off oven (PTI No. 163-13). Ms. Manelski informed me that his equipment is no longer located at the facility. As a result, I did not assess compliance with the recordkeeping requirements of this permit and am going to request that PTI No. 163-13 be voided.

## Recordkeeping

### *Emission Calculations*

The permit requires Depor to maintain monthly records of the gallons of each VOC-containing material used, the VOC content of each material as applied, as well as the monthly and 12-month rolling VOC emission calculations. The facility provided all of the required records in an excel spreadsheet through January 2020. The provided records indicate that the monthly rate of VOC emissions is typically below 1 ton/month. The monthly emissions for January 2020 were 0.41 tons of VOC. The rolling 12-month VOC emissions totaled 7.1 tons at the end of January 2020. The VOC emission calculations demonstrate compliance with the permit limit of 35.0 tpy.

In addition to the VOC emissions calculations, the facility is also required to keep similar records of HAP emissions calculations. These records were provided in the same document at the VOC emissions calculations. Aggregate HAP emissions in the month of January were 0.03 tons. Rolling 12-month HAP emissions as of January 2020 were 0.63 tons, which is far below the permitted limit of 22.4 tpy. The single HAP with the highest rolling 12-month emissions was N-Butanol, at 0.18 tpy, which is again well below the permitted limit of 8.9 tpy.

### *RTO Temperature*

The facility is required to maintain continuous records of the RTO temperature, recorded at a minimum of 15-minute intervals. The RTO is equipped with a digital temperature monitor, which continuously records temperature. A copy of the temperature records for the previous two months is attached. The temperature records indicate that the RTO is regularly maintained at a temperature of approximately 1550°F while the coating lines are operating. The drops in RTO temperature on the records correspond to weekends when the facility was not operating. The records indicate that the facility is in compliance with the requirement to maintain the RTO temperature above 1,500°F during operation.

**Facility Walk Through**

The most recent permit modifications in March 2019 removed three coating units from the permit: EUOVERHEAD, EUHANDSPRAY, and EUQUADPRANTCOATER. I confirmed that the coating lines removed from the permit and the burn-off oven are no longer operating at the facility and had been removed from the site. As previously mentioned, the facility is also permitted to operate a burn-off oven, which is no longer operating at the site. The previous version of the permit (PTI No. 43-99E) had not yet been voided until confirmation that the old coating equipment was not operational. I will contact the permit section to void the outdated version of the permit (PTI No. 43-99E) and the permit for the burn-off oven (PTI No. 163-13).

During my inspection, I also observed that some of the permitted equipment had been removed. Depor is permitted to operate three grit blast cabinets, but two of these units were removed and only one is still operating on site. Ms. Maneski explained that the other two had been removed around December 2019. In addition, the Ronci dip/spin coating lines (EURONCI and EURONC12) have been removed from the facility.

The equipment that is still on site and operating includes: one Dual Model 24 dip spin coating booth and curing oven, two new dip spin coating booths with in-line curing ovens, a phosphate pre-treatment line, one grit blast cabinet, and a bowl blaster. The dip spin lines all have a similar layout and operate in essentially the same way. The parts are loaded into baskets and submerged into vats of coating material. The basket full of parts is then lifted out of the vat and spun to remove excess coating. The parts are dumped out of the basket and onto a conveyor that takes them through the in-line curing oven. Emissions from the three coating booths and in-line curing ovens are all controlled by the RTQ. The phosphate pre-treatment line is a multi-stage process consisting of cleaning, rinsing, and phosphating parts to prepare them for the coating process. The grit blast cabinet and bowl blaster are used to remove impurities on the surface of the metal part prior to coating.

During my inspection, I observed the RTQ and noted that the chamber temperature was at 1,549°F. This aligns with the temperature records provided by the facility and demonstrates compliance with the permit requirement to maintain the RTQ temperature above 1,500°F.

**Malfunction Abatement Plan**

The facility is required to have a Malfunction Abatement Plan (MAP) in place for the regenerative thermal oxidizer. I was provided a copy of the MAP, which was dated April 2, 2019. The MAP included a list of aspects of the control device to be checked, who is to check them, and the frequency at which they should be checked. It also details the methods of checking those operating characteristics, the ideal operating parameters, what to do in the case of a malfunction, and what spare parts are available on hand. The MAP appears to be very thorough and adequately addresses the requirements of the permit and of Rule 911(2). A copy of the MAP is attached to this report.

**Conclusion**

Based on my on-site inspection and review of the required records, Depor (SRN: N6611) appears to be in compliance with PTI No. 43-99G, as well as all applicable air quality rules and regulations. I also confirmed that equipment covered by previous permits is no longer operating at the facility (PTI No. 43-99E and PTI No. 163-13) and contacted the permit section to void these permits.

NAME Kathryn Logant DATE 04/08/2020 SUPERVISOR Subantonykalkemka